

<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE WESTERN DISTRICT OF MISSOURI</p> <p>3 WESTERN DIVISION</p> <p>4</p> <p>5</p> <p>6 KEITH CARNES,</p> <p>7 Plaintiff,</p> <p>8 vs. Case No. 4:23-cv-00278-RK</p> <p>9 ROBERT BLEHM, et al.,</p> <p>10 Defendants.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 VOLUME 1</p> <p>17 VIDEO-RECORDED VIDEOCONFERENCE DEPOSITION OF</p> <p>18 LORIANNE MORROW, a witness, taken on behalf of the</p> <p>19 Plaintiff, pursuant to Notice, on May 31, 2024,</p> <p>20 before</p> <p>21</p> <p>22 SUSAN J. MUCKENTHALER</p> <p>23</p> <p>24 Certified Verbatim Reporter, Certified in Missouri</p> <p>25 and Kansas.</p>	<p>1 TABLE OF CONTENTS</p> <p>2 EXAMINATION</p> <p>3 Questions By Mr. Hilke 5</p> <p>4 Questions By Ms. Peters 40</p> <p>5</p> <p>6 EXHIBITS</p> <p>7 1 - Map of neighborhood 8</p> <p>8</p> <p>9 CERTIFICATE OF REPORTER 84</p> <p>10 ERRATA SHEET 85</p> <p>11 SIGNATURE PAGE 86</p> <p>12</p> <p>13 Reporter's Note: Electronic exhibits provided by</p> <p>14 counsel were made OCR searchable (PDF), downsampled</p> <p>15 to 600 dpi, digitally labeled if not previously</p> <p>16 labeled, flattened, archived as original exhibits,</p> <p>17 and provided electronically to all ordering counsel.</p> <p>18 Processing electronic exhibits can change the file</p> <p>19 size, resolution, and metadata of files originally</p> <p>20 provided.</p> <p>21</p> <p>22 (ph) indicates a phonetic spelling.</p> <p>23</p> <p>24 [sic] indicates the text is as stated.</p> <p>25</p> <p>26</p> <p>27</p> <p>28</p> <p>29</p> <p>30</p> <p>31</p> <p>32</p> <p>33</p> <p>34</p> <p>35</p> <p>36</p> <p>37</p> <p>38</p> <p>39</p> <p>40</p> <p>41</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p> <p>46</p> <p>47</p> <p>48</p> <p>49</p> <p>50</p> <p>51</p> <p>52</p> <p>53</p> <p>54</p> <p>55</p> <p>56</p> <p>57</p> <p>58</p> <p>59</p> <p>60</p> <p>61</p> <p>62</p> <p>63</p> <p>64</p> <p>65</p> <p>66</p> <p>67</p> <p>68</p> <p>69</p> <p>70</p> <p>71</p> <p>72</p> <p>73</p> <p>74</p> <p>75</p> <p>76</p> <p>77</p> <p>78</p> <p>79</p> <p>80</p> <p>81</p> <p>82</p> <p>83</p> <p>84</p> <p>85</p> <p>86</p> <p>87</p> <p>88</p> <p>89</p> <p>90</p> <p>91</p> <p>92</p> <p>93</p> <p>94</p> <p>95</p> <p>96</p> <p>97</p> <p>98</p> <p>99</p> <p>100</p>
<p>1 APPEARANCES</p> <p>2 For Plaintiff:</p> <p>3 MR. WALLACE G. HILKE</p> <p>4 LOEVY & LOEVY</p> <p>5 311 North Aberdeen Street, 3rd Floor</p> <p>6 Chicago, Illinois 60607</p> <p>7 hilke@loevy.com</p> <p>8 (312) 243-5900</p> <p>9</p> <p>10 For Defendant Amy McGowan:</p> <p>11 MR. JOSHUA N. HANER</p> <p>12 ASSISTANT COUNTY COUNSELOR</p> <p>13 415 East 12th Street, Suite 200</p> <p>14 Kansas City, Missouri 64106</p> <p>15 jhaner@jacksongov.org</p> <p>16 (816) 881-3975</p> <p>17</p> <p>18 For all other Defendants:</p> <p>19 MS. DIANE F. PETERS</p> <p>20 WYRSCH HOBBS & MIRAKIAN, PC</p> <p>21 1200 Main Street, Suite 2110</p> <p>22 Kansas City, Missouri 64105</p> <p>23 dpeters@whmlaw.net</p> <p>24 (816) 221-0080</p> <p>25</p> <p>26</p> <p>27</p> <p>28</p> <p>29</p> <p>30</p> <p>31</p> <p>32</p> <p>33</p> <p>34</p> <p>35</p> <p>36</p> <p>37</p> <p>38</p> <p>39</p> <p>40</p> <p>41</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p> <p>46</p> <p>47</p> <p>48</p> <p>49</p> <p>50</p> <p>51</p> <p>52</p> <p>53</p> <p>54</p> <p>55</p> <p>56</p> <p>57</p> <p>58</p> <p>59</p> <p>60</p> <p>61</p> <p>62</p> <p>63</p> <p>64</p> <p>65</p> <p>66</p> <p>67</p> <p>68</p> <p>69</p> <p>70</p> <p>71</p> <p>72</p> <p>73</p> <p>74</p> <p>75</p> <p>76</p> <p>77</p> <p>78</p> <p>79</p> <p>80</p> <p>81</p> <p>82</p> <p>83</p> <p>84</p> <p>85</p> <p>86</p> <p>87</p> <p>88</p> <p>89</p> <p>90</p> <p>91</p> <p>92</p> <p>93</p> <p>94</p> <p>95</p> <p>96</p> <p>97</p> <p>98</p> <p>99</p> <p>100</p>	<p>1 THE REPORTER: Good afternoon. My name is</p> <p>2 Susan Muckenthaler. I am a Missouri-certified court</p> <p>3 reporter. We are now on the record. Today's date</p> <p>4 is May 31st, 2024, and the time is approximately</p> <p>5 1:07 p.m.</p> <p>6 This is the Zoom-recorded deposition of</p> <p>7 Lorianne Morrow in the matter of Keith Carnes versus</p> <p>8 Robert Blehm, et al., Case No. 4:23-cv-00278-RK.</p> <p>9 The video recording is not being externally</p> <p>10 monitored or recorded by a videographer.</p> <p>11 Would counsel please identify yourselves</p> <p>12 and whom you represent and agree on the record that</p> <p>13 there is no objection to this deposition officer</p> <p>14 administering a binding oath to the witness by</p> <p>15 videoconference.</p> <p>16 MR. HILKE: Wally Hilke for plaintiff</p> <p>17 Keith Carnes. We agree.</p> <p>18 MS. PETERS: Diane Peters for all the</p> <p>19 defendants except Amy McGowan, and I don't object.</p> <p>20 MR. HANER: And Josh Haner on behalf of</p> <p>21 defendant Amy McGowan, and I agree.</p> <p>22 LORIANNE MORROW,</p> <p>23 a witness, being first duly sworn, testified under</p> <p>24 oath as follows:</p> <p>25</p>

**Exhibit W1 (Morrow's 2024
deposition)**



<p style="text-align: right;">Page 5</p> <p>1 EXAMINATION</p> <p>2 BY MR. HILKE:</p> <p>3 Q. Good afternoon, Ms. Morrow. Can you hear</p> <p>4 me okay?</p> <p>5 A. I can hear you just fine.</p> <p>6 Q. Good. As I mentioned, my name is Wally</p> <p>7 Hilke. I'm one of the lawyers for the plaintiff,</p> <p>8 Keith Carnes, in this lawsuit. The defendants in</p> <p>9 this lawsuit, who are represented by attorneys here,</p> <p>10 are officers and detectives with the Kansas City</p> <p>11 Police Department as well as Amy -- Amy McGowan.</p> <p>12 I want to -- I know you have had your</p> <p>13 deposition taken before, but I want to go over a few</p> <p>14 things to keep us going smoothly today. So even</p> <p>15 though you're in your home, you've sworn an oath to</p> <p>16 tell the truth, and this deposition will proceed</p> <p>17 exactly like it would if it were in a court</p> <p>18 reporter's office. Do you understand all that?</p> <p>19 A. Yes, I do.</p> <p>20 Q. Just like then, we all have to talk one at</p> <p>21 a time so the court reporter can take down</p> <p>22 everything we say. Does that make sense?</p> <p>23 A. Makes a lot of sense to me.</p> <p>24 Q. I want to make sure you understand all my</p> <p>25 questions, whether it's a bad Zoom connection or a</p>	<p style="text-align: right;">Page 7</p> <p>1 know what happened in -- you know, I mean --</p> <p>2 Q. Okay.</p> <p>3 A. Yeah.</p> <p>4 Q. Good.</p> <p>5 And so you don't know of any reason why</p> <p>6 you couldn't -- is there any reason you couldn't</p> <p>7 accurately remember and testify as to your knowledge</p> <p>8 relating to this case today?</p> <p>9 A. I can remember things to the best of my</p> <p>10 knowledge. But at that point in time, I was sick,</p> <p>11 which I say still am now, but I -- it's -- I'm under</p> <p>12 better control than it was back then.</p> <p>13 Q. Okay. Thank you.</p> <p>14 And, Ms. Morrow, you and I have spoken</p> <p>15 before; correct?</p> <p>16 A. Correct.</p> <p>17 Q. And I asked you to tell me what you</p> <p>18 remembered regarding Larry White's murder; correct?</p> <p>19 A. Correct.</p> <p>20 Q. And did I ask you to tell me the truth</p> <p>21 when we talked?</p> <p>22 A. Yes.</p> <p>23 Q. Did I make you any promises?</p> <p>24 A. No.</p> <p>25 Q. Did I threaten you in any way when we</p>
<p style="text-align: right;">Page 6</p> <p>1 bad question from me; so will you please ask me to</p> <p>2 clarify if you do not understand my question for any</p> <p>3 reason during the deposition today?</p> <p>4 A. Yes, I will.</p> <p>5 Q. And are you -- are you prepared to give</p> <p>6 testimony today?</p> <p>7 A. Yes, I am.</p> <p>8 Q. Is there any --</p> <p>9 MR. HILKE: Diane, I don't think you meant</p> <p>10 to, but you shared your screen right now.</p> <p>11 (Discussion off the record.)</p> <p>12 Q. (By Mr. Hilke) And is there any reason --</p> <p>13 you know, health, medication, anything else -- why</p> <p>14 you wouldn't be able to give honest and accurate</p> <p>15 testimony today?</p> <p>16 A. Say that again. I couldn't hear you. You</p> <p>17 got to talk a little louder.</p> <p>18 Q. You got it.</p> <p>19 I'm wondering if there's any reason --</p> <p>20 like, you know, if you had recently taken a strong</p> <p>21 medication or you were having a health issue -- why</p> <p>22 you could not give true and accurate testimony</p> <p>23 today?</p> <p>24 A. My health don't have nothing to do with</p> <p>25 it. I will give the true testimony that -- what I</p>	<p style="text-align: right;">Page 8</p> <p>1 talked?</p> <p>2 A. No.</p> <p>3 Q. And so you've -- I want to -- and I know</p> <p>4 you've testified multiple times regarding what you</p> <p>5 remember from Larry White's murder, and I may ask</p> <p>6 you to go over some things that you've testified</p> <p>7 about previously.</p> <p>8 And I guess I'll -- I'll start with this:</p> <p>9 On October 7 -- or I guess October 6, 2003, were you</p> <p>10 present in the area of 29th Street and Wabash Avenue</p> <p>11 that evening?</p> <p>12 A. Yes, I was.</p> <p>13 Q. All right. I'm going to share my screen</p> <p>14 with you for a minute here and mark an exhibit.</p> <p>15 Let's -- let's mark this Exhibit 1. This is a map</p> <p>16 representing the area of 29th Street and Wabash</p> <p>17 Avenue. Are you able to see this on your screen?</p> <p>18 A. Yes. I'm familiar with that area because</p> <p>19 I grew up in that area.</p> <p>20 Q. Okay. Good.</p> <p>21 A. I'm very familiar with it.</p> <p>22 Q. Good. I'm -- I'm just going to leave it</p> <p>23 up while we talk because it may help me, since I</p> <p>24 didn't grow up there, to ask you some questions</p> <p>25 about where you were and what happened. Okay.</p>



<p style="text-align: right;">Page 9</p> <p>1 What -- so on October 7, 2003 -- or --</p> <p>2 so -- I'm sorry. Strike that.</p> <p>3 On October 6, 2003, when you were in the</p> <p>4 area of 29th Street and Wabash Avenue, can you tell</p> <p>5 me -- what were you doing in the area at the time?</p> <p>6 A. I would say I was going on to a friend of</p> <p>7 mine's house where -- who -- they lived on 26th --</p> <p>8 2604 Benton Boulevard.</p> <p>9 Q. Okay.</p> <p>10 A. Which it wasn't really that far, maybe a</p> <p>11 few more blocks over on the other side of -- of the</p> <p>12 street -- well, Prospect, I will say.</p> <p>13 Q. Okay. And what time of day did you come</p> <p>14 into the area, meaning was it in the morning or in</p> <p>15 the evening?</p> <p>16 A. It was in the evening time.</p> <p>17 Q. Okay. And where were you -- where were</p> <p>18 you coming from? What direction were you moving</p> <p>19 towards when you came through the area?</p> <p>20 A. I was actually coming off of 30th and</p> <p>21 Wabash.</p> <p>22 Q. Okay.</p> <p>23 A. My niece lived over there at the time.</p> <p>24 Q. Okay. So if I understand the map, you</p> <p>25 were coming from the south going north through the</p>	<p style="text-align: right;">Page 11</p> <p>1 Q. Okay. So you saw -- I think you said you</p> <p>2 saw Reggie chasing Larry. Is that correct?</p> <p>3 A. Reggie and Kiki.</p> <p>4 Q. Sorry. Reg- --</p> <p>5 A. It was Reggie and Kiki.</p> <p>6 Q. Go ahead. Go ahead.</p> <p>7 A. Yes. It was Reggie and Kiki --</p> <p>8 Q. They were --</p> <p>9 A. -- chasing Larry.</p> <p>10 Q. Okay.</p> <p>11 A. Larry was on the --</p> <p>12 Q. And sorry. Just --</p> <p>13 A. Larry started off --</p> <p>14 Q. I don't mean to inter- --</p> <p>15 A. -- when they was --</p> <p>16 Okay. Can you hear me?</p> <p>17 Q. I can hear you. I was just going to say</p> <p>18 wait for my question, and let's go --</p> <p>19 A. Okay.</p> <p>20 Q. -- one question and --</p> <p>21 A. Okay.</p> <p>22 Q. -- answer at a time.</p> <p>23 It's all right.</p> <p>24 A. Okay. But I had to tell you how it -- at</p> <p>25 what corner he was on so you can really get a better</p>
<p style="text-align: right;">Page 10</p> <p>1 area. Is that correct?</p> <p>2 A. Right. Right.</p> <p>3 Q. All right. And when you were walking</p> <p>4 through the area that night, did anything -- did</p> <p>5 anything unusual happen?</p> <p>6 A. Yes.</p> <p>7 Q. What's -- what's the first unusual thing</p> <p>8 you remember happening as you walked through the</p> <p>9 area?</p> <p>10 A. I remember when I was walking through the</p> <p>11 area heading towards -- you know, I would be going,</p> <p>12 like, north -- north to -- north to east because</p> <p>13 east is on the side where the South Benton would be.</p> <p>14 I was walking down the street, you know, normally</p> <p>15 walking, doing my -- minding my own business, and</p> <p>16 the confrontation between Larry and Reggie got on.</p> <p>17 He was chasing a man with a gun down the street, you</p> <p>18 know. I was trying to hurry up and get away because</p> <p>19 on the corner of Prospect, of 29th Street, there's a</p> <p>20 church sit there -- sitting there. Right now, still</p> <p>21 been there forever. And I -- I -- you know, all</p> <p>22 this was happening. I was running towards that way</p> <p>23 to -- because there's some stairs down in the bottom</p> <p>24 of it to go down there for safety, and he seen me;</p> <p>25 and, you know, I seen him as well.</p>	<p style="text-align: right;">Page 12</p> <p>1 understanding of the whole map you got down there.</p> <p>2 You understand what I'm saying?</p> <p>3 Q. I understand. And --</p> <p>4 A. Yes.</p> <p>5 Q. -- our --</p> <p>6 A. Yes.</p> <p>7 Q. -- court reporter -- to be fair to her, we</p> <p>8 really have to talk one at a time because --</p> <p>9 A. Okay.</p> <p>10 Q. -- she can't --</p> <p>11 A. That's fine. That's fine.</p> <p>12 Q. She can't write down two things at once.</p> <p>13 And so --</p> <p>14 A. I understand.</p> <p>15 Q. -- if we go --</p> <p>16 THE REPORTER: Okay. Excuse me.</p> <p>17 THE WITNESS: Uh-huh.</p> <p>18 THE REPORTER: That's -- that's just an</p> <p>19 example. When you're answering him "Okay" in the</p> <p>20 middle of his question, that's where I can't get it</p> <p>21 all. So just pause.</p> <p>22 THE WITNESS: Pause. Okay.</p> <p>23 THE REPORTER: Okay.</p> <p>24 THE WITNESS: All right. I --</p> <p>25 THE REPORTER: Thanks.</p>



Page 13

1 THE WITNESS: I understand.
 2 THE REPORTER: Thank you.
 3 **Q. (By Mr. Hilke) So I'm going to -- I'm**
 4 **going to say, you know, wait for my full question**
 5 **and then wait a good second to make sure I'm done**
 6 **because I talk slow sometimes. And then --**
 7 A. Okay.
 8 **Q. -- give me your answer --**
 9 A. I understand --
 10 **Q. -- and I'll ask --**
 11 A. -- (indiscernible).
 12 THE REPORTER: Excuse me. See, that was
 13 an interruption. So just -- just a little pause.
 14 Thanks.
 15 THE WITNESS: Uh-huh.
 16 **Q. (By Mr. Hilke) Okay. So I want to -- I**
 17 **want to take this one -- one step at a time. So**
 18 **while you were in the area, you noticed Reggie and**
 19 **Kiki chasing Larry; is that correct?**
 20 A. Correct.
 21 **Q. Do you know Larry's last name?**
 22 A. White.
 23 **Q. And who was -- who was Reggie?**
 24 A. Reggie was a dope dealer that moved in the
 25 neighborhood.

Page 14

1 **Q. And who was Kiki?**
 2 A. He also was one of the dope dealer that
 3 moved in the neighborhood.
 4 **Q. Had -- had you interacted with them before**
 5 **you saw them that night?**
 6 A. No.
 7 **Q. Did you know who they were when you saw**
 8 **them?**
 9 A. Yes.
 10 **Q. And how did you know who they were?**
 11 A. Because they -- they was in the
 12 neighborhood that -- where I knew people that lived
 13 there for a long time. So they was saying the
 14 new -- the new D-man, which they were saying -- that
 15 moved in on the block.
 16 **Q. So is it fair to say you were familiar**
 17 **with them even though you didn't have a relationship**
 18 **with them?**
 19 A. Exactly.
 20 **Q. And when you saw Reggie chasing Larry,**
 21 **was -- did -- was Reggie holding or carrying**
 22 **anything?**
 23 A. Yes, he was.
 24 **Q. What was he carrying?**
 25 A. A gun.

Page 15

1 **Q. What kind of gun?**
 2 A. An AK-47.
 3 **Q. Is that a pistol or a rifle?**
 4 A. A rifle.
 5 **Q. Was Kiki carrying anything as he chased**
 6 **Larry?**
 7 A. He had a handgun. Maybe a .22 or .38.
 8 **Q. So let me back up a little bit. When you**
 9 **first noticed Kiki and Reggie chasing Larry, where**
 10 **were you located at that time?**
 11 A. I was across the street. There used to be
 12 an apartment building over there before you get to
 13 the church parking lot to cut across.
 14 **Q. All right. So you were --**
 15 A. Where I was --
 16 **Q. Go ahead.**
 17 A. I would be heading, like, northeast, as I
 18 was saying to you earlier.
 19 **Q. Uh-huh.**
 20 A. Yes, I was, like, on the 20- -- 29th -- it
 21 would be -- be going, like, towards northeast side,
 22 you know. So corner.
 23 **Q. Were you between Wabash and Prospect on**
 24 **29th Street at that time?**
 25 A. Yes.

Page 16

1 **Q. And where was Larry when you first saw him**
 2 **at that time?**
 3 A. When I first saw Larry, before I was in
 4 between Pros- -- Wabash, he was on -- standing on
 5 the corner of 29th and Olive.
 6 **Q. Okay. So he was, you know, a good block**
 7 **west of you when you first saw him; is that right?**
 8 A. Yes.
 9 **Q. And what direction did Larry run in at**
 10 **that time?**
 11 A. He was running east.
 12 **Q. Now, did he -- one second. Did you -- you**
 13 **mentioned something about the church -- the church**
 14 **parking lot in terms of where you ended up during**
 15 **this; correct?**
 16 A. Correct.
 17 **Q. And can you describe that, how you ended**
 18 **up in the church parking lot.**
 19 A. Well, when -- when he was -- see, you can
 20 look -- I look -- was looking behind me, and they
 21 was running, chasing him. So I had to get --
 22 actually, I had to get out of the way or I probably
 23 would have been shot as well. So how I ended up
 24 there -- because I was running away from the
 25 gunfire.



Page 17

1 **Q. And did you take cover in the church**
 2 **parking lot?**
 3 A. Yes, sir, I did.
 4 **Q. Where did you take cover there?**
 5 **Q. In the stair -- in the stairwell. They**
 6 **got some stairwell, lead to a basement.**
 7 **Q. And from the stairwell, were you able to**
 8 **see onto 29th Street from there?**
 9 A. Yes.
 10 **Q. And after you took cover, did you observe**
 11 **anything else?**
 12 A. When he shot -- when he shot Larry -- yes,
 13 I observed it.
 14 **Q. Okay.**
 15 A. And he seen me.
 16 **Q. All right. And did -- and did you see**
 17 **where Larry ultimately ...**
 18 A. He -- he -- when he fell or --
 19 **Q. Yeah, can you --**
 20 A. -- what are you asking me?
 21 **Q. Did you see when he fell?**
 22 A. He fell at Fish Town.
 23 **Q. Okay. And -- and did you see where -- and**
 24 **who did you see? You said you saw someone shoot**
 25 **him. Who did you then see shoot Larry?**

Page 18

1 A. I see he -- Reggie shoot Larry.
 2 **Q. Okay.**
 3 A. I don't really know his last name or
 4 nothing like that. It's just like if you live in
 5 the neighborhood, you know people.
 6 **Q. Okay. And when you say you saw Reggie and**
 7 **he saw you, did you make eye contact with each**
 8 **other?**
 9 A. Yes, I did.
 10 **Q. Okay. And how did you feel when he made**
 11 **eye contact with you?**
 12 A. I was scared, you know, because I have
 13 never witnessed this before. You know, I have never
 14 witnessed nobody getting murdered in front of your
 15 face.
 16 **Q. Did Reggie have a reputation in the**
 17 **neighborhood at the time?**
 18 A. He had a bad reputation, yes.
 19 **Q. What was his reputation?**
 20 A. He -- he -- what you call it -- "kingpin"
 21 of the drug dealers, you know. He ran all of these
 22 old people out of their apartments because those
 23 apartments that they was in was -- a lot of old
 24 people live there. Yes, he had a bad reputation.
 25 **Q. So -- and, by the way, I'm -- sorry. One**

Page 19

1 **second.**
 2 A. Okay.
 3 **Q. Now, according to this map, there's, like,**
 4 **an alley going north on 29th Street between the**
 5 **apartment at 2408/2410 East 29th Street and a house**
 6 **at 2846 Wabash. Are you familiar with that alley?**
 7 A. Yes.
 8 **Q. And there's also a driveway between that**
 9 **alley and Wabash Avenue. Are you familiar with that**
 10 **driveway?**
 11 A. Yes.
 12 **Q. And am I correct -- is it -- can you --**
 13 **you know, back in 2003, could you -- was it possible**
 14 **to run up the alley and run east on the driveway to**
 15 **get onto Wabash?**
 16 A. Yes.
 17 **Q. And I think you mentioned hearing shots,**
 18 **if I heard you right, at -- at least two times.**
 19 **Once --**
 20 A. Yes.
 21 **Q. -- before --**
 22 A. Yes.
 23 **Q. -- you took cover and once after. Is that**
 24 **correct?**
 25 A. That's correct.

Page 20

1 **Q. All right. Now, when you heard shots the**
 2 **first time, where -- like, was there a direction**
 3 **where you heard or saw the shots coming from?**
 4 A. The shots was coming from the direction
 5 of -- it -- that was in the street. So I was on the
 6 sidewalk cutting across the church parking lot.
 7 **Q. Okay. And where -- what was the direction**
 8 **from where you heard or saw the shot?**
 9 **And, by the way, the first time you heard**
 10 **or saw the shots, did you see them or hear them or**
 11 **both?**
 12 A. I seen them chasing him, and I seen -- I
 13 seen the fire from the gun.
 14 **Q. And in part of the chase you observed, did**
 15 **any of it involve, like, the alley and the driveway**
 16 **we were just talking about around 2846 Wabash?**
 17 A. Yes. Yes.
 18 **Q. And so during the chase, did you -- during**
 19 **the chase, did you see Kiki and Reggie coming**
 20 **southwards from the driveway at 2846 Wabash?**
 21 A. You have to jump a fence --
 22 **Q. Okay.**
 23 A. -- to get -- get over to get into Wabash.
 24 It's -- you have to come across a fence to get over
 25 there. It wasn't a tall fence. It's just -- like,



Page 21

1 they jumped over.
 2 **Q. Is that what they did?**
 3 A. Yes.
 4 **Q. Okay. And so during that part of the**
 5 **chase, can you tell me, like, where -- so I want you**
 6 **just to use Fish Town as a point of reference --**
 7 **right? -- Fish Town, like, all the way east --**
 8 A. Fish Town.
 9 **Q. -- on 29th Street.**
 10 A. Uh-huh.
 11 **Q. Was Larry White between you and the**
 12 **shooters?**
 13 A. At this point, I had got out of the way so
 14 he was running from the shooters.
 15 **Q. All right. And you --**
 16 A. So I was up a -- I've -- I'm going to
 17 explain this to you. I was up a little way from
 18 him.
 19 **Q. Uh-huh. So --**
 20 A. I wasn't completely hit the parking lot
 21 yet at the church. So yes.
 22 **Q. So it was, like, you are the most -- you**
 23 **were the farthest east, then Larry was running from**
 24 **them and -- and by "them," I mean Kiki and Reggie --**
 25 **and Reggie and Kiki were a little bit west chasing**

Page 22

1 **them; is that right?**
 2 A. Right.
 3 **Q. Okay. Thanks.**
 4 **One second. Okay. Now, after you heard**
 5 **the first gunshot, did you look westward in the**
 6 **direction of the apartments, like the apartments at**
 7 **2404 East 29th Street, at any time?**
 8 A. Yes.
 9 **Q. Okay. And was there someone at that time**
 10 **known to you as Tre?**
 11 A. I just heard of his name -- Tre.
 12 **Q. Okay. And do you know -- do you now know**
 13 **the -- the -- I guess, the legal name of the person**
 14 **named Tre?**
 15 A. I just found that out recently, yes.
 16 **Q. Okay. And is he the same person who you**
 17 **testified at his criminal trial for Larry White's**
 18 **murder a couple years later?**
 19 A. Yes.
 20 **Q. Okay. Now, at that time after you heard**
 21 **the first gunshot and you looked towards the**
 22 **apartments, did you observe Tre at that time?**
 23 A. Yes.
 24 **Q. Okay. And did you spend very long, like,**
 25 **watching him or -- at that time?**

Page 23

1 A. No, I didn't just watch him. No.
 2 **Q. And were there very many people in front**
 3 **of the apartments then?**
 4 A. Yes.
 5 **Q. Okay. And was Tre someone you saw at any**
 6 **time chasing the victim, Larry White?**
 7 A. No.
 8 **Q. Was Tre someone at any time you saw firing**
 9 **a weapon that evening?**
 10 A. No.
 11 **Q. Do you remember what you did after you**
 12 **saw -- sorry. One second.**
 13 **And so I want to ask a minute about -- do**
 14 **you recall that Tre was the defendant in a criminal**
 15 **trial a couple of years after Larry White was shot**
 16 **and that you testified at that criminal trial?**
 17 A. Yes.
 18 **Q. And, by the way, have you reviewed your**
 19 **transcript from that criminal trial at any time?**
 20 A. No.
 21 **Q. And -- and when was the last time -- and**
 22 **you both testified at -- multiple times and signed**
 23 **some affidavits in the 20-plus years since Larry**
 24 **White was murdered; correct?**
 25 A. Correct.

Page 24

1 **Q. When was the last time you looked at any**
 2 **of those documents, meaning any trial transcripts,**
 3 **any affidavits, anything like that?**
 4 A. I haven't looked at anything.
 5 **Q. Okay.**
 6 A. I -- I really haven't seen the transcript
 7 from any trial.
 8 **Q. So do you recall that at the criminal**
 9 **trial -- meaning Tre or Keith Carnes's criminal**
 10 **trial back in October 2005 -- your testimony was**
 11 **that Keith Carnes had chased Larry and shot and**
 12 **killed him?**
 13 A. Yes.
 14 **Q. Now, was that --**
 15 MS. PETERS: Wally --
 16 MR. HILKE: Go ahead.
 17 MS. PETERS: I'm sorry. I -- I believe
 18 you said "October 2005." I just want to make sure
 19 we have a clean record.
 20 MR. HILKE: Oh, thanks. I'm sorry. I --
 21 I just meant back in 2005, not any specific month.
 22 **Q. (By Mr. Hilke) You remember giving that**
 23 **testimony at a criminal trial in 2005 against Keith**
 24 **Carnes; correct?**
 25 A. Correct.



Page 25

1 **Q. And was that true?**

2 A. No.

3 **Q. And, by the way, do you recall that your**
 4 **testimony was that Larry had run east on**
 5 **29th Street, Keith Carnes had chased him, and you**
 6 **had followed behind the two of them?**

7 A. That -- what -- I don't remember what I
 8 said at that time because I never seen the
 9 transcript; and, you know, at that time I was sick.

10 **Q. Sure. Let me ask you: Is that something**
 11 **you would do? If you saw a shooting happening,**
 12 **would you run in the same direction as the shooter?**

13 A. No.

14 **Q. Would you -- now, what would your -- what**
 15 **would your reaction be if you were on the street at**
 16 **the time there was a shooting?**

17 A. To take cover.

18 MS. PETERS: Object to form.

19 **Q. (By Mr. Hilke) Go ahead.**

20 **Did you hear my question?**

21 A. Yes. To take cover.

22 **Q. Is that what you actually did when Larry**
 23 **White was shot and killed in October 2003?**

24 A. I took cover, yes. Because after they
 25 was -- excuse me. Can I say something?

Page 26

1 **Q. You know, you've answered my question;**
 2 **so --**

3 A. Okay.

4 **Q. -- let me move --**

5 A. Okay. I -- yeah. I take cover.
 6 Can you hear me?

7 **Q. I can.**

8 A. I can barely hear you now. Because you --

9 **Q. I'm going to --**

10 A. -- shaking up.

11 **Q. I'm going to speak --**

12 THE REPORTER: One at a time.

13 **Q. (By Mr. Hilke) Do you know who Amy**
 14 **McGowan is?**

15 A. Yes.

16 **Q. Who is Amy McGowan?**

17 A. A prosecutor.

18 **Q. Now, after you saw Larry White be shot and**
 19 **killed, did you interact with Amy McGowan?**

20 A. Yes.

21 **Q. What do you -- did you ever -- and how**
 22 **long after the shooting, if you can remember, did**
 23 **you interact with Amy McGowan?**

24 A. A couple of days after the shooting.

25 **Q. Okay. And how did -- how did you come**

Page 27

1 **into contact with Amy McGowan?**

2 A. She -- she came to the neighbor- -- that
 3 same neighborhood, yes.

4 **Q. And what was your -- did you speak with**
 5 **her then?**

6 A. Yes, I did.

7 **Q. What was your conversation with her?**

8 A. The conversation with her was saying that
 9 Keith Carnes did the shooting, and if I didn't, I
 10 would be charged with drug possession -- which I
 11 didn't have drugs on me.

12 **Q. And who said that Keith Carnes was the**
 13 **shooter in that conversation?**

14 A. Amy.

15 **Q. And did you tell her what you had seen?**

16 A. Yeah.

17 **Q. What did you say to her?**

18 A. I told her that he wasn't the shooter,
 19 that the other guy was, and I told her who he -- who
 20 they were.

21 **Q. And, specifically, who did you tell Amy**
 22 **McGowan was the shooter?**

23 A. I told her Reggie -- which he had another
 24 street name he was going by, but I just know they
 25 called him "Reggie" -- and Kiki. He had another

Page 28

1 name. I don't know -- I don't really know his
 2 real -- whole name.

3 **Q. Did you ever -- were you ever taken also**
 4 **to Amy McGowan's office?**

5 A. Yes.

6 **Q. And did that occur on multiple occasions?**

7 A. Not multiple occasions, maybe two -- two
 8 or three times.

9 **Q. And when you first went to Amy McGowan's**
 10 **office, how did you get there?**

11 A. What they call those -- those people that
 12 works at the Jackson County Courthouse to pick you
 13 up? Sheriff, I will want to say a sheriff. His
 14 name was Anthony something.

15 **Q. Okay.**

16 A. He worked for the Jackson County
 17 Courthouse.

18 **Q. Okay. And so it was a law enforcement**
 19 **officer named Anthony; is that right?**

20 A. He worked in the Jackson County
 21 Courthouse; so he would be a law enforcement
 22 officer. They pick up the witnesses -- up -- is
 23 what I'm trying to say.

24 **Q. Okay. And you -- okay.**

25 **The first time you talked with Amy McGowan**



Page 29

1 in your -- in her office -- can you tell me what you
2 remember happening during that interaction.

3 A. Well, I remember that she was showing me
4 the picture of Mr. Carnes, which I know his name
5 now, and I was -- and she pulled the book out, and
6 she had -- you know, how they show you mug shot. So
7 I was picking out the pictures, and then she picked
8 out this one photo of Mr. Carnes and said he the one
9 did it, did the shooting. And at that time, she
10 also showed me the house where the -- the shell
11 casing landed. And I didn't see that part, you
12 know, where that shell casing land, the house and
13 everything.

14 Q. When you -- the first time you talked to
15 Amy McGowan in her office, did you tell her who you
16 saw commit the shooting?

17 A. Yes, I did.

18 Q. And who did you tell her you saw commit
19 the shooting?

20 A. Reggie and Kiki.

21 Q. And -- and did she say why she was telling
22 you that it was, instead, Keith Carnes who committed
23 the shooting?

24 A. Yes. Because they thought he was the big
25 drug dealer that took over these people apartment.

Page 30

1 It wasn't him.

2 Q. Now --

3 A. They wanted him off the streets.

4 Q. And when you were -- during that first
5 interaction with Amy McGowan in her office, did she
6 say anything to you about, like -- I'm trying to ask
7 this in an open-ended way. I'm trying to ask if she
8 said anything to you one way or another about --
9 well, actually, let me take a step back.

10 A. Okay.

11 Q. Did you -- what was your reaction when Amy
12 McGowan told you that -- you know, told you who she
13 wanted -- and, actually, sorry. Let me start one
14 more time.

15 A. Okay.

16 Q. Did -- when Amy McGowan told you it was
17 Keith Carnes, was she telling you what she thought,
18 or was she telling you what she wanted you to say?

19 A. What she wanted me to say.

20 Q. How did you feel when she told you what
21 she wanted you to say?

22 A. I felt very uncomfortable.

23 Q. And did you ultimately listen to her and
24 decide to say what she had told you to say instead
25 of what you saw at Keith Carnes's criminal trial?

Page 31

1 A. Yes, sir. She threatened -- she
2 threatened me with jail time and planting drugs on
3 me. Yes, I did.

4 Q. Do you remember what she said when she
5 threatened you with jail time and planting drugs on
6 you?

7 A. She said if I didn't say Keith Carnes did
8 it that she would plant drugs on me; I would lose my
9 kids. At the time my kids was around -- well, a
10 little younger than them; and, you know, I didn't --
11 "You didn't want that" -- destroying my reputation.
12 So I did what I was told to do.

13 Q. And you mentioned her taking you to show
14 you where shell casings were. Is that something Amy
15 McGowan did with you?

16 A. Actually, when I was in her office, she
17 had the gun there and she had the pictures -- a
18 picture of the house, and she told me this is where
19 the shell casing was at.

20 Q. Okay. Was that something you knew
21 before --

22 A. No.

23 Q. -- where the shell casings --

24 A. No. No.

25 Q. So you did not know until she told you

Page 32

1 where the shell casings were; correct?

2 A. No, sir, I did not know. I was not
3 looking for where the bullets land. I just didn't
4 want to get hit.

5 Q. Were you ever interviewed by police
6 officers about Larry White's shooting?

7 A. Once.

8 Q. Where did that interview take place?

9 A. Downtown Kansas City --

10 Q. Is it --

11 A. -- at the headquarters.

12 Q. You said "at headquarters"?

13 A. Uh-huh.

14 Q. Was that somewhere you had been before?

15 A. No.

16 Q. How many officers interviewed you?

17 A. At the time I think it's only -- was two
18 because it was at nighttime. There was only two
19 on that -- on that shift.

20 Q. And did they ask you about Larry White's
21 murder?

22 A. Yes.

23 Q. Did they ask you if you had seen who
24 committed the shooting?

25 A. Yes.



Page 33

1 **Q. What did you tell them?**
 2 A. I also told them Kiki and Reggie.
 3 **Q. What did they do after you told them you**
 4 **saw Kiki and Reggie?**
 5 A. They said no, they didn't -- wasn't the
 6 shooter. I guess I -- I'm not going to say they --
 7 every officer is corrupt, but it is a lot of corrupt
 8 police officers. And they told me that -- to say
 9 this -- Tre is the one that killed Larry.
 10 **Q. And so were they telling you what they**
 11 **thought, or were they telling you what to say?**
 12 A. They was telling me what to say.
 13 **Q. And did the -- did -- and, by the way,**
 14 **it -- do you remember what those officers looked**
 15 **like, the ones who interviewed you?**
 16 A. No, I don't remember because it was such a
 17 long time ago and everything. It was a long time
 18 ago.
 19 **Q. Did -- did those officers ask you to sign**
 20 **a statement?**
 21 A. Yes.
 22 **Q. Did you sign that statement?**
 23 A. They -- I signed the statement. They
 24 printed it off on the computer.
 25 **Q. Now, can you tell me when -- did you sit**

Page 34

1 **with the officers as they typed your statement, or**
 2 **did they bring you a statement to sign?**
 3 A. They was writing in -- you know how they
 4 have their little handbook? The little books they
 5 flip over. And they was writing it in there. And
 6 then he went and typed it up afterwards.
 7 **Q. Now, when they typed it up afterwards, did**
 8 **you go with them to a computer to type it up or --**
 9 A. No.
 10 **Q. -- did you leave where you --**
 11 A. No. No. I was sitting in -- what you
 12 call a little cul-de-sac, like a off- -- a little
 13 office thing where they have them by -- split them
 14 in half. No, I didn't go with them.
 15 **Q. Okay. One second. Okay.**
 16 **So if the police had written down**
 17 **everything you told them, they would have written**
 18 **down that you saw Reginald Thomas or -- you -- that**
 19 **you saw Reggie and Kiki commit the murder; right?**
 20 A. Right.
 21 **Q. Do you recall a female prosecutor who**
 22 **asked you questions at Keith Carnes's criminal**
 23 **trial?**
 24 A. Yes.
 25 **Q. And was that -- was that Amy McGowan, or**

Page 35

1 **was that someone else?**
 2 A. First, it was Amy, and then it was
 3 Ms. Parson [sic].
 4 **Q. Okay. And did -- did Ms. Parsons -- and**
 5 **so did Ms. Parsons actually ask you questions at the**
 6 **trial about what you had seen?**
 7 A. I don't recall what's -- the questions she
 8 asked me.
 9 **Q. So, you know, not which questions she**
 10 **asked you, but do you remember that she asked you**
 11 **questions at the trial?**
 12 A. Yes, she did.
 13 **Q. Did -- and did you talk to Ms. Parsons**
 14 **before she asked you questions, like, in front of**
 15 **the judge?**
 16 A. No.
 17 **Q. Did you ever tell Ms. Parsons that you had**
 18 **been pressured to identify Keith Carnes?**
 19 A. No.
 20 **Q. And why didn't you tell her?**
 21 A. I was afraid.
 22 **Q. Before -- did Ms. Parsons ever ask you if**
 23 **you had been pressured before she examined you in**
 24 **court?**
 25 A. No, she did not.

Page 36

1 **Q. Now, did you have a -- like, a moniker or**
 2 **a nickname you used back in October 2003?**
 3 A. My nickname -- no.
 4 **Q. Did you ever use the name "Goldie"?**
 5 A. Yes.
 6 A. And when you were in that area, like 29th
 7 and Wabash, did you usually use your legal name, or
 8 did you usually go by Goldie?
 9 A. Goldie.
 10 **Q. And was Keith Carnes or Tre someone you**
 11 **had interacted with before in October of 2003?**
 12 A. I have only seen him once.
 13 **Q. And did he -- would he have known your**
 14 **real name, like "Lorianne Morrow"?**
 15 A. No.
 16 **Q. If he knew your name, would he have known**
 17 **your real name or your nickname?**
 18 A. My nickname.
 19 **Q. I think you've testified in the past that**
 20 **there have been times when you're -- because of**
 21 **health reasons, your memory has not been as good.**
 22 **Is that true?**
 23 A. That's true.
 24 **Q. And how does that compare to now? Meaning**
 25 **is -- you know, is your memory -- is your memory**



<p style="text-align: right;">Page 37</p> <p>1 still bad today?</p> <p>2 A. No.</p> <p>3 Q. This event you saw, seeing Larry White be</p> <p>4 shot and killed -- is that something that stands out</p> <p>5 to you in your memory?</p> <p>6 A. Yes.</p> <p>7 Q. And do you remember -- do you know someone</p> <p>8 by the name of Latahra Smith?</p> <p>9 A. Yes.</p> <p>10 Q. And do you remember -- do you remember</p> <p>11 when you first -- when you first met Latahra Smith?</p> <p>12 A. 2015 -- 2014 -- 2015, something like that,</p> <p>13 maybe 2016. I don't remember what year it was.</p> <p>14 Q. Okay. And did -- did -- what was your</p> <p>15 understanding when you met Latahra Smith of why she</p> <p>16 was talking to you?</p> <p>17 A. She was talking to -- about Keith Carnes.</p> <p>18 Q. Okay.</p> <p>19 A. That's how I really learnt his name in the</p> <p>20 beginning, his real name.</p> <p>21 Q. Did Latahra Smith ever ask you to lie on</p> <p>22 Keith Carnes's behalf?</p> <p>23 A. No.</p> <p>24 Q. Did she ever promise you anything for</p> <p>25 helping her?</p>	<p style="text-align: right;">Page 39</p> <p>1 down; mentally, it was tearing me down. So I just</p> <p>2 needed to get this out.</p> <p>3 Q. (By Mr. Hilke) Okay.</p> <p>4 MR. HILKE: Ms. Morrow, I don't have any</p> <p>5 more questions right now. I should have mentioned</p> <p>6 you can take a break whenever you want and -- to use</p> <p>7 a bathroom or whatever.</p> <p>8 THE WITNESS: Okay.</p> <p>9 MR. HILKE: I expect the other attorneys</p> <p>10 might have some questions for you too.</p> <p>11 THE WITNESS: Okay.</p> <p>12 MR. HILKE: Do you need a bathroom break</p> <p>13 or anything before we continue?</p> <p>14 THE WITNESS: No. We can just go ahead</p> <p>15 and get this over with -- get it -- get it over with</p> <p>16 because, like I said, I have things to do.</p> <p>17 MR. HILKE: Okay.</p> <p>18 MS. PETERS: Ms. Morrow, my name is Diane</p> <p>19 Peters. Can you see me on your screen?</p> <p>20 THE WITNESS: No, I don't see you. I</p> <p>21 just --</p> <p>22 MS. PETERS: I'll wave.</p> <p>23 THE WITNESS: I still see him. I don't</p> <p>24 see you.</p> <p>25 MS. PETERS: Can you see me?</p>
<p style="text-align: right;">Page 38</p> <p>1 A. No.</p> <p>2 Q. Did she ever threaten you in -- in any</p> <p>3 way?</p> <p>4 A. No, she haven't.</p> <p>5 Q. Give me one second, please.</p> <p>6 Do you -- do you recall testifying a few</p> <p>7 years ago when Keith Carnes had a habeas hearing?</p> <p>8 A. Yes, I do.</p> <p>9 Q. And did you tell the truth then about what</p> <p>10 you saw the night Larry White was murdered?</p> <p>11 A. Yes, I did.</p> <p>12 Q. And how did it feel to tell the truth when</p> <p>13 you testified then?</p> <p>14 A. It -- it just -- my whole -- it lift up a</p> <p>15 whole lot of things off my heart. Because at this</p> <p>16 point, when I was really sick, I didn't think I was</p> <p>17 going to make it and -- to testify for him in his</p> <p>18 court case.</p> <p>19 Q. And had you -- one second.</p> <p>20 Did you feel any guilt about testifying</p> <p>21 against Keith Carnes back in 2005?</p> <p>22 A. Yes, I did.</p> <p>23 Q. And why did you feel guilt?</p> <p>24 A. It was just -- I mean, it was just eating</p> <p>25 at me. It -- it -- physically, it was tearing me</p>	<p style="text-align: right;">Page 40</p> <p>1 THE WITNESS: No. Just got a picture of</p> <p>2 me. I just see me. Just me.</p> <p>3 MS. PETERS: You can hear me, though;</p> <p>4 right?</p> <p>5 THE WITNESS: I can hear you. Yes, ma'am.</p> <p>6 EXAMINATION</p> <p>7 BY MS. PETERS:</p> <p>8 Q. I represent the Kansas City Missouri Board</p> <p>9 of Police Commissioners, some detectives, and some</p> <p>10 police officers in this lawsuit that Keith Carnes</p> <p>11 has filed. Okay?</p> <p>12 A. Okay.</p> <p>13 Q. I have some questions for you. Earlier</p> <p>14 you said that you were sick, and I got the</p> <p>15 impression, when you said you were sick, you meant</p> <p>16 at the time Larry White's homicide happened. Did I</p> <p>17 understand that correctly?</p> <p>18 A. Yes, ma'am.</p> <p>19 Q. Can you elaborate on --</p> <p>20 A. I had --</p> <p>21 Q. -- that.</p> <p>22 A. -- systematic -- systematic [sic] lupus.</p> <p>23 Q. Did your illness, lupus, interfere with</p> <p>24 your ability to tell the truth back then at --</p> <p>25 A. No.</p>



Page 41

1 THE REPORTER: One at a time.
 2 **Q. (By Ms. Peters) Did your abil- -- did**
 3 **your illness, lupus, cause you or interfere with**
 4 **your ability to tell the truth in 2003, 2004, and**
 5 **2005?**
 6 A. No.
 7 **Q. You testified earlier that you talked to**
 8 **Mr. Wally Hilke; is that correct?**
 9 A. Correct.
 10 **Q. How many times have you talked to**
 11 **Mr. Hilke?**
 12 A. Maybe three times.
 13 **Q. How many of those times were over the**
 14 **phone?**
 15 A. All -- twice -- maybe -- twice over the
 16 phone.
 17 **Q. How many of those times were in person?**
 18 A. Once.
 19 **Q. When was the first time you talked to**
 20 **Mr. Hilke?**
 21 A. I don't remember the date, but that was
 22 the first time I met him in person.
 23 **Q. And then --**
 24 A. I don't remember.
 25 **Q. How long ago?**

Page 42

1 A. Maybe 4th -- last year. It was last year.
 2 I don't remember what month.
 3 **Q. So sometime last year, you met Mr. Hilke**
 4 **for the first time, and that was in person?**
 5 A. Yes, ma'am.
 6 **Q. Where was that?**
 7 A. Downtown.
 8 **Q. Downtown where?**
 9 A. He was in a hotel.
 10 **Q. Do you mean downtown Kansas City,**
 11 **Missouri?**
 12 A. Yes.
 13 **Q. Did you meet him at the hotel?**
 14 A. Yes.
 15 **Q. What was the name of the hotel?**
 16 A. I can't remember what hotel he stayed in,
 17 because they just built it up. I just -- I don't
 18 remember.
 19 **Q. And how did you know to meet him at the**
 20 **hotel?**
 21 A. He called me and told me he'd be in town.
 22 **Q. So he called you?**
 23 A. Uh-huh.
 24 **Q. He called you and asked you to meet with**
 25 **him at the hotel?**

Page 43

1 A. Yes.
 2 **Q. So you had a phone call. Then you met him**
 3 **in person at the hotel, and then you talked to him**
 4 **two more times on the phone; is that correct?**
 5 A. That's correct.
 6 **Q. When he talked to you on the phone to ask**
 7 **if you'd meet him at the hotel, was that the first**
 8 **time that you talked to him?**
 9 A. Yes, ma'am.
 10 **Q. Do you know how he got your phone number?**
 11 A. Yes.
 12 **Q. How?**
 13 A. Latahra.
 14 **Q. Did Mr. Hilke tell you he got your phone**
 15 **number from Latahra?**
 16 A. I'm -- I'm just assuming that's where he
 17 got my number from. I'm not sure.
 18 **Q. So tell me about this very first**
 19 **conversation with Mr. Hilke on the phone when he**
 20 **asked you to meet him at the hotel.**
 21 A. He -- he said he wanted to ask me a few
 22 questions about -- relating to Keith Carnes and the
 23 matter. That's -- basically was it.
 24 **Q. And did he ask you any of those questions**
 25 **on the phone?**

Page 44

1 A. In person.
 2 **Q. Okay. So he told you that he wanted to**
 3 **ask you some questions about Keith Carnes; correct?**
 4 A. Yes.
 5 **Q. And did he ask you if you'd be willing to**
 6 **meet with him?**
 7 A. Yes.
 8 **Q. And did he set up a place and time and day**
 9 **to meet then?**
 10 A. Yes, he set up a place to meet. And that
 11 was downtown because he had came into town. I'm
 12 assuming he don't live in Kansas City.
 13 **Q. What else did you and Mr. Hilke talk about**
 14 **on the phone that very first time?**
 15 A. That he -- you know, he was talking
 16 about -- nice for him to do -- to meet me and -- and
 17 everything. Not too much of anything --
 18 **Q. Did he tell you that --**
 19 A. Nothing important.
 20 THE REPORTER: Excuse me. Very "nice to
 21 meet you," and what did you say after that?
 22 A. He just asked -- very nice to meet me
 23 and -- about -- he was Keith Carnes's lawyer and
 24 that he needed to discuss some matter with me
 25 concerning Keith.



Page 45

1 Q. (By Ms. Peters) When he told you that he
2 was Keith Carnes's lawyer, did he also tell you that
3 Keith Carnes had a lawsuit against the police and
4 prosecutor Amy McGowan?
5 A. Yes.
6 Q. Okay. What did he tell you about the
7 lawsuit?
8 A. I really don't recall how much he told me
9 about the lawsuit.
10 Q. Then you met with Mr. Hilke at the hotel;
11 right?
12 A. Right.
13 Q. And did you sit in a room in the lobby
14 somewhere and -- with Mr. Hilke and discuss matters?
15 A. Actually, I was waiting in the lobby
16 because he had another person in there who was up
17 there talking to him, and he came downstairs and got
18 me.
19 Q. And did you and Mr. Hilke then sit down in
20 the hotel and have a discussion?
21 A. Yes.
22 Q. And -- and what did you discuss?
23 A. Discussing this lawsuit.
24 Q. And, more specifically, did Mr. Hilke ask
25 you certain questions?

Page 46

1 A. Yes.
2 Q. And what did he ask?
3 A. He just asked me what did I remember
4 about -- that happened that night when Larry got
5 killed and -- about what -- how much do I remember
6 what happened in the trial and did -- do I know what
7 happened. And I did.
8 Q. Did Mr. Hilke show you any photographs?
9 A. No, ma'am.
10 Q. Did he show you any other documents?
11 A. No, ma'am.
12 Q. How long did that meeting last with
13 Mr. Hilke?
14 A. Thirty minutes.
15 Q. And then do you recall how you and
16 Mr. Hilke left the meeting? And by that, I mean did
17 Mr. Hilke say, "I'll call you," or "Will you give a
18 deposition," or anything of that nature?
19 A. Yes. He said he'd be getting in touch
20 with me.
21 Q. And then you said there was a phone call
22 with Mr. Hilke after that; correct?
23 A. Correct.
24 Q. And how much later, after your meeting in
25 the hotel with Mr. Hilke, was the phone call with

Page 47

1 him?
2 A. February.
3 Q. February of 2023?
4 A. February of 20-- this year is when I
5 spoke with him again.
6 Q. February of 2024?
7 A. Right.
8 Q. And can you tell me what that conversation
9 entailed.
10 A. The conversation entailed of -- just
11 deposition we're doing right now.
12 Q. How long did that phone conversation last?
13 A. It didn't last too long.
14 Q. Did that conversation last five minutes?
15 A. I would say ten at the most.
16 Q. And in that conversation, February of
17 2024, you discussed setting up your deposition with
18 Mr. Hilke?
19 A. Yes.
20 Q. What else did you discuss with Mr. Hilke
21 during that phone call, if anything?
22 A. I discussed with him that I was having
23 surgery on February the 5th, which I was having a
24 hip replacement, and we discussed that, and I said,
25 "If you could let me heal and -- and then we'll get

Page 48

1 the deposition done," yeah.
2 Q. And then it's your testimony that you had
3 another phone conversation with Mr. Hilke after
4 that; correct?
5 A. Correct.
6 Q. And then when was that next phone call?
7 A. I told him that I wasn't completely
8 healed. And it was in -- this is May -- it was in
9 April. And I told him I wasn't completely healed
10 yet. He said, well, he'll talk to you guys about
11 that.
12 Q. So you had a phone call with Mr. Hilke in
13 April 2024 about doing your deposition and you
14 healing from a surgery?
15 A. Right. Correct.
16 Q. In the phone call in February with
17 Mr. Hilke in February 2024, did you discuss any more
18 facts about the homicide of Larry White?
19 A. No. We did not at that time.
20 Q. How about in April of 2024 with the phone
21 call with Mr. Hilke? Did you discuss anything more
22 about the facts of Larry White's homicide?
23 A. Yes.
24 Q. And tell me about that.
25 A. He was just asking me questions -- what --



Page 49

1 what do I remember, what I saw at the time of his
2 homicide.
3 **Q. Have you spoken to anyone from Mr. Hilke's**
4 **law firm, that you know of, other than Mr. Hilke?**
5 A. Only him.
6 **Q. When was the last time you spoke with**
7 **Ms. Latahra Smith?**
8 A. Oh, it's been since last year.
9 **Q. When you spoke with Ms. Latahra Smith last**
10 **year, what was the occasion that caused you to speak**
11 **with Ms. Smith?**
12 A. That occasion -- it was -- think his --
13 his trial was coming up again -- Keith.
14 **Q. What trial was that?**
15 A. The trial when he -- his conviction got
16 overturned.
17 **Q. Ma'am, I want to ask you about some of the**
18 **events of the night of the homicide. You've already**
19 **testified to some of it. I believe you testified**
20 **earlier that you were going to a friend's house on**
21 **October 6th, 2003. Is that correct?**
22 A. Correct.
23 **Q. Do you remember the friend's name?**
24 A. Yes. His name was Michael Thompson.
25 **Q. And you had a niece that lived at 30th and**

Page 50

1 **Wabash?**
2 A. Yes.
3 **Q. What's your niece's name, ma'am?**
4 A. Brenda White.
5 **Q. Can you say that first name again.**
6 A. Brenda.
7 **Q. By the way, Ms. Morrow --**
8 A. Uh-huh.
9 **Q. -- going back to 2003, did you know Larry**
10 **White?**
11 A. Yes, ma'am.
12 **Q. How did you know Larry White?**
13 A. Larry White went to school with my sons.
14 **Q. With how many of your sons?**
15 A. He went to school with my three oldest
16 son.
17 **Q. Can you tell me the name of your three**
18 **oldest sons.**
19 A. Rickey, Eric, and Eran.
20 **Q. How does Eran spell his name?**
21 A. E-r-a-n.
22 **Q. Is Rickey and Eric and Eran's last name**
23 **Morrow?**
24 A. Rickey's last name is Gardner,
25 G-a-r-d-n-e-r.

Page 51

1 **Q. What is Eric's last name?**
2 A. Morrow. And so is Eran.
3 **Q. Did you know Larry White in -- in any**
4 **other way other than he went to school with your**
5 **three oldest sons?**
6 (Technical issue. Discussion off record.)
7 A. I know his mother, his grandmother, his
8 sister -- I knew -- I knew his whole family -- and
9 his uncles.
10 **Q. (By Ms. Peters) How did you know the**
11 **White family?**
12 A. We lived in the same neighborhood.
13 **Q. For how many years did you live in the**
14 **same neighborhood as the White family prior to Larry**
15 **White's murder?**
16 A. Oh, maybe 20, 30 years.
17 **Q. Did you grow up with some members of the**
18 **White family?**
19 A. Yes.
20 **Q. Who did you grow up with?**
21 A. With his mom and his uncles.
22 **Q. And when you say "his mom and his uncles,"**
23 **do you mean Larry White's?**
24 A. Larry White had an uncle named Tim and
25 Michael.

Page 52

1 **Q. What's Tim and Michael's last name?**
2 A. White.
3 **Q. What was Larry's mom's name?**
4 A. I can't remember her name. I don't
5 remember her name. I don't recall it right
6 offhand -- her name.
7 **Q. Is she deceased now? Do you know?**
8 A. All of those -- all of them are deceased.
9 **Q. So you grew up --**
10 A. The uncles and the mom -- and the --
11 her -- his mom.
12 **Q. So you grew up with Larry White's mom and**
13 **Larry White's uncles Tim and Michael White?**
14 A. Yes.
15 **Q. What was Larry White's grandmother's name?**
16 A. I can't remember her name either
17 because --
18 **Q. Does Juanita --**
19 A. -- we used to call her -- we used to call
20 her -- you know, back then we just call them
21 "Grandma" or -- you know, we'd never call them by
22 their first name.
23 **Q. Does "Juanita White" ring a bell?**
24 A. Yes. Juanita -- mom.
25 **Q. Who was Juanita White?**



Page 53

1 A. I'm -- I'm thinking it's his mom or either
2 his sister, because he's had a sister named Juanita
3 too.
4 **Q. Okay. You think it was Larry White's mom**
5 **or Larry White's sister?**
6 A. Yes.
7 **Q. Do you remember what Larry White's**
8 **grandmother's name was?**
9 A. No, ma'am. Because at the time we just
10 called them "Grandma."
11 **Q. Okay.**
12 A. We didn't call them by their first name.
13 THE REPORTER: Okay. Just remember. One
14 at a time. Pause.
15 **Q. (By Ms. Peters) During the time that**
16 **Larry White was murdered, were you friends with any**
17 **members of the White family?**
18 A. Yes.
19 **Q. Who were you friends with?**
20 A. Michael White and -- and Tim White.
21 **Q. Where did Michael and Tim White live at**
22 **the time?**
23 A. On the corner of 29th and Olive.
24 **Q. And, just to be clear, Tim and Michael**
25 **White lived on the corner of 29th and Olive in**

Page 54

1 **Kansas City, Missouri?**
2 A. Yes, ma'am. The whole family lived in a
3 big house right there.
4 **Q. Back in 2003 they lived there; correct?**
5 A. Yes.
6 **Q. Okay. After you witnessed the murder of**
7 **Larry White, who is the first person that you talked**
8 **to about the murder of Larry White?**
9 A. The first person I talked to about the
10 murder of Larry White was my niece.
11 **Q. Is that niece Brenda White?**
12 A. Yes.
13 **Q. What did you tell Brenda White?**
14 A. I just told her what I seen because I was
15 crying and upset, and then she -- I didn't go back
16 around there no more because it was just
17 traumatizing me.
18 **Q. Did you tell Brenda White who got**
19 **murdered?**
20 A. Yes.
21 **Q. Did you tell Brenda White who you saw**
22 **murder Larry White?**
23 A. Yes.
24 **Q. And who did you tell her?**
25 A. I told her that Kiki and Reggie killed

Page 55

1 Larry.
2 **Q. And -- and when was it that you talked to**
3 **your niece Brenda White about the murder of Larry**
4 **White?**
5 A. She had came over to where I was staying
6 at, because, actually, I did live on 26th and Benton
7 with my friend Michael.
8 **Q. When did you talk to Brenda White about**
9 **the murder of Larry White?**
10 A. Maybe two or three days later.
11 **Q. Did you talk to your niece Brenda White**
12 **before or after your first conversation with Amy**
13 **McGowan?**
14 A. I talked to her before (indiscernible) --
15 THE REPORTER: Excuse me. Real quick.
16 You said you talked to her before, and then there
17 was a little glitch. Was there anything after that?
18 THE WITNESS: Okay. Oh, I'm sorry.
19 A. Before.
20 **Q. (By Ms. Peters) I can clar- -- let -- let**
21 **me ask again. So -- let me ask you the question**
22 **again so we're clear.**
23 A. Okay.
24 **Q. Did you talk to your niece Brenda White**
25 **about the homicide of Larry White before or after**

Page 56

1 **your first conversation with Amy McGowan?**
2 A. It was before.
3 **Q. When you talked to your niece Brenda White**
4 **about the homicide of Larry White, who else was**
5 **present during that conversation?**
6 A. Just me and her.
7 **Q. And was that conversation at your house at**
8 **26th and Benton?**
9 A. Yes. We was talking in private, yes.
10 **Q. Who was the next person that you talked to**
11 **about the homicide of Larry White after speaking to**
12 **your niece Brenda White?**
13 A. Well, I think my -- Brenda, because Brenda
14 didn't know Larry -- Larry White too. So she -- she
15 is the one that talked to his family. It wasn't me.
16 She told them.
17 **Q. Brenda White, your niece, is the one that**
18 **told Larry White's family what?**
19 A. About what I seen at -- when Larry got
20 murdered.
21 **Q. And how do you know that your niece told**
22 **Larry White's family that?**
23 A. She told me.
24 **Q. So Brenda White, your niece, told Larry**
25 **White's family that you, Lorianne Morrow, witnessed**



Page 57

1 **Kiki and Reggie kill Larry White?**

2 MR. HILKE: Objection to foundation.

3 A. Yeah.

4 **Q. (By Ms. Peters) And you know that because**
5 **Brenda White told you that?**

6 A. She told -- she told me she told them,
7 yes.

8 **Q. So after you spoke with your niece Brenda**
9 **White, who was the next person that you talked to**
10 **about the murder of Larry White?**

11 A. Amy.

12 **Q. Amy McGowan?**

13 A. Yes.

14 **Q. Before I ask you some questions about Amy**
15 **McGowan, let me ask you this: Did you ever -- did**
16 **you ever talk to any member of the White family**
17 **about the murder of Larry White?**

18 A. No.

19 **Q. Did any member of the White family ever**
20 **tell you to say Keith Carnes murdered Larry White?**

21 A. No.

22 **Q. One moment, please.**

23 **Did Larry White's family ever tell you who**
24 **they thought was the shooter?**

25 A. No.

Page 58

1 **Q. Did Larry White's family ever tell you**
2 **they thought the shooter was Keith Carnes?**

3 A. No.

4 **Q. Did Larry White's family ever tell you**
5 **that you should identify Keith Carnes as the**
6 **shooter?**

7 A. No.

8 **Q. Did Larry White's family ever offer to pay**
9 **you if you identified Keith Carnes as the shooter?**

10 A. No, ma'am.

11 **Q. Did Larry White's family ever show up at**
12 **your house and offer to pay you money if you**
13 **identified Keith Carnes as the shooter?**

14 A. No, ma'am.

15 **Q. Did Larry White's mother ever go to your**
16 **house and say she would pay you money if you**
17 **identified Keith Carnes as the shooter?**

18 A. No, ma'am.

19 **Q. Did Larry White's family ever threaten you**
20 **in any way regarding the -- strike that.**

21 **Did you ever feel threatened in any way --**

22 A. No, ma'am.

23 **Q. -- relating to Larry White's**
24 **homicide -- well, strike that.**

25 **Let me ask -- I'm asking you bad**

Page 59

1 **questions. Let me ask you another question.**

2 **Did Larry White's family ever cause you to**
3 **feel threatened relating to the murder of Larry**
4 **White?**

5 A. No, ma'am.

6 **Q. Did you ever testify at the habeas hearing**
7 **for Mr. Carnes that Larry White's family told you to**
8 **identify Keith Carnes as the shooter?**

9 MR. HILKE: Objection to foun- --

10 A. No, ma'am.

11 MR. HILKE: Wait -- wait. I -- I need to
12 put an objection on the record.

13 Objection to foundation.

14 You can answer.

15 **Q. (By Ms. Peters) Did you testify, ma'am,**
16 **that -- at Keith Carnes's habeas hearing in 2021**
17 **that the -- Larry White's family told you to**
18 **identify Keith Carnes as the shooter?**

19 MR. HILKE: Same objection.

20 A. No, they didn't.

21 **Q. (By Ms. Peters) My question was a little**
22 **bit different. My question was did you testify**
23 **under oath at the habeas hearing in 2021 that Larry**
24 **White's family told you to identify Keith Carnes as**
25 **the shooter?**

Page 60

1 MR. HILKE: Same objection.

2 **Q. (By Ms. Peters) You can answer.**

3 A. They never asked me to -- none of that,
4 no.

5 **Q. Okay. So you never testified to that --**
6 **was my question.**

7 MR. HILKE: Same objection.

8 A. Yes, I never testified to that. Yes,
9 ma'am.

10 **Q. (By Ms. Peters) Do you recall what your**
11 **testimony was from the 2021 habeas hearing?**

12 A. I recall what it was.

13 **Q. So when I'm asking you if you testified at**
14 **the 2021 habeas hearing whether Larry White's family**
15 **told you to identify Keith Carnes as the shooter**
16 **you -- you remember that you did not testify to that**
17 **under oath; correct?**

18 A. I did not --

19 MR. HILKE: Same objection.

20 A. -- testify to that.

21 **Q. (By Ms. Peters) Okay. So the second**
22 **person that you spoke to about Larry White's**
23 **homicide was Amy McGowan?**

24 A. Yes.

25 **Q. And can you describe how that meeting came**



Page 61

1 **about.**

2 MR. HILKE: Objection to form.

3 But you can answer. You can answer.

4 A. Okay. The meet- -- how the meeting came
5 about is when I was walking in the same area where
6 it happened at -- and she pulled up on a lot of
7 people that was standing out there. I -- I can also
8 name the people if you would like.

9 **Q. (By Ms. Peters) Please, ma'am. Identify**
10 **all the people that were standing there.**

11 A. Okay. It was Wendy Lockett and the
12 lady -- she's passed away now -- and it was --
13 what's -- what's the girl's name? I can't think of
14 that other girl's name, but she was standing out
15 there. She also passed away. But Wendy Lockett
16 was -- was the main person that was out there as
17 well.

18 **Q. The other person that you're talking about**
19 **but can't remember her name -- is that Felicia**
20 **Jones?**

21 A. Yes.

22 **Q. Did Felicia Jones pass away?**

23 A. I'm thinking she did.

24 **Q. So you, Wendy Lockett, and Felicia Jones**
25 **were standing in the area where the homicide**

Page 62

1 **occurred?**

2 A. And I don't think this is the girl's real
3 name, but she went by Star. She was a white female.

4 **Q. Anybody else that you can think of right**
5 **now that was standing with you at that time?**

6 A. No. But it was a lot of people out there.
7 I didn't know everybody that was out there. I just
8 knew the main people.

9 **Q. So let me ask you this question. You,**
10 **Wendy Lockett, Felicia Jones, and a white female**
11 **that went by Star were standing in the area where**
12 **the homicide occurred when Amy McGowan drove up on**
13 **you?**

14 A. Yes.

15 **Q. And this occurred how many days after**
16 **Larry White's homicide?**

17 A. I can't remember if he got murdered a
18 weekday or weekend, but it was after that. It was
19 just a few days after. It wasn't -- not exactly
20 after, but just a few days after it.

21 **Q. Ma'am, I know this was over 20 years ago.**
22 **Can you tell me exactly how many days after the**
23 **homicide that -- that Amy McGowan drove up on you**
24 **the first time?**

25 A. I don't want to give an incorrect answer.

Page 63

1 I want to say maybe four or five days. I don't want
2 to give an incorrect answer.

3 **Q. Because earlier in your deposition today,**
4 **you said it was a couple of days.**

5 A. A couple of days to me is like a week,
6 because that's -- that's how we speak in general. I
7 mean -- maybe you're not used to speaking like that.

8 **Q. I'm not.**

9 A. A couple days is like a week. Yes. Yes.
10 THE REPORTER: One at a time, please.

11 **Q. (By Ms. Peters) So Amy McGowan drove up**
12 **on you about a week after the homicide?**

13 MR. HILKE: Object to form.

14 You can answer.

15 A. Yes.

16 **Q. (By Ms. Peters) And when Amy McGowan**
17 **drove up on you about a week after the homicide,**
18 **Wendy Lockett, Felicia Jones, and Star were with**
19 **you?**

20 A. They were there, yes.

21 **Q. What was Wendy Lockett doing at that time?**

22 A. Wendy Lockett always hung out over there.

23 **Q. And just to make sure we're talking about**
24 **the same area, you're talking about the area of**
25 **29th-Wabash-Olive area?**

Page 64

1 A. Yes, ma'am.

2 **Q. What do you recall Felicia Jones doing**
3 **over there at the time Amy McGowan drove up on you**
4 **the first time?**

5 A. She also lived in that neighborhood. She
6 lived in the neighborhood. Wendy did.

7 **Q. And same question for Star. What do you**
8 **recall Star doing at that time?**

9 A. Hanging out.

10 **Q. And you may have said this, and I**
11 **apologize, but do you know Star's first or last**
12 **name?**

13 A. I really don't -- really know her first
14 and last name because she went by Star, but she
15 never used her -- because a lot of people didn't use
16 their real name. They didn't want people to know
17 their real name. No.

18 **Q. At the ti -- now, let me go back to the**
19 **night of Larry White's homicide. Did you see Wendy**
20 **Lockett at -- in the area on the night of Larry**
21 **White's homicide?**

22 A. Yes, ma'am.

23 **Q. What did you see Wendy Lockett doing on**
24 **the night of Larry White's homicide?**

25 A. I mean, she -- she was getting high on the



Page 65

1 apartment building step. There was apartment
2 building right there before you reached the church
3 parking lot too as well. It's not there no more.

4 **Q. Was she -- was she -- I'm sorry. You said**
5 **she was standing outside?**

6 A. She was sitting on the porch getting high
7 off of crack cocaine. You mean -- I mean, I'll just
8 say it, you know.

9 **Q. What porch building do you recall her**
10 **sitting at?**

11 A. It's -- it's -- it'll be on the -- it
12 would be on -- what? -- it'd be on the right-hand --
13 across from the -- the house where they found the
14 gun case -- shell casing at. It was apartment
15 building there. It's not there anymore, though.

16 MS. PETERS: So, Wally, if you don't mind,
17 just for the record --

18 **Q. (By Ms. Peters) I'm going to have**
19 **Mr. Hilke pull up the diagram again so you can show**
20 **us where you saw Wendy Lockett.**

21 A. Okay. Yes, ma'am.

22 MR. HILKE: I've got it up.

23 A. Okay.

24 **Q. (By Ms. Peters) Ms. Morrow, can you just**
25 **identify on Exhibit 1 where you saw --**

Page 66

1 A. Okay.

2 **Q. -- Wendy Lockett.**

3 A. Okay. There's -- Wendy Lockett -- that
4 was 2846 Wabash, and right across the street from
5 that apartment -- I mean, from the house -- was a
6 apartment building standing there. Right --
7 now it's a -- now it's a vacant lot.

8 **Q. Okay. So Wendy Lockett was standing on a**
9 **porch getting high at a -- an apartment building**
10 **that was located at 2506 East 29th Street?**

11 A. Yes.

12 **Q. Who else did you see sitting there with**
13 **Wendy Lockett on that porch?**

14 A. It was a few guys. Star was there, and
15 the lady name you mentioned earlier. They was all
16 there.

17 **Q. Felicia Jones was there too?**

18 A. Yes.

19 **Q. And just so it's clear for the record, on**
20 **the night that Mr. White was murdered, you saw Wendy**
21 **Lockett, Star, Felicia Jones sitting on the front**
22 **porch of 2506 East 29th Street?**

23 A. Yes, ma'am.

24 **Q. And when did you first see them that**
25 **night?**

Page 67

1 A. You know, when I was walking down the
2 street. When I walked down the street, I would have
3 to make a right-hand turn to the corner because
4 they -- before -- I didn't get across the street all
5 the way yet. They was on the other side of me
6 cross- -- me crossing over to -- closer to the
7 church because this was -- this apartment building
8 was, like, sitting behind the church.

9 **Q. Okay. And when you saw Kiki and Reggie**
10 **chasing Larry White, where did you see that chase**
11 **happening? And if you can show us on the diagram**
12 **...**

13 A. Okay. This is the -- because the way they
14 came around behind the building -- no. Close to
15 2846 Wabash is a -- okay. There you go. Okay. The
16 alleyway. You can call it "buildings" because the
17 last apartment building is where they would be at.
18 (Indiscernible) --

19 **Q. Can you say that last --**

20 A. (Indiscernible.) The last apartment
21 building that were --

22 THE REPORTER: Excuse me.

23 A. -- they was --

24 THE REPORTER: Excuse me. Stop. Your
25 internet -- your internet connection was shaky, and

Page 68

1 I couldn't understand what you were saying.

2 **Q. (By Ms. Peters) Can you just repeat what**
3 **you were saying, Ms. Morrow.**

4 A. Okay. I want you to understand me
5 clearly. The three apartments in a row -- the third
6 apartment --

7 (Discussion off the record.)

8 (A recess was taken.)

9 **Q. (By Ms. Peters) Okay. Ms. Morrow, we're**
10 **back on the record.**

11 **Before I forget, what's your address?**

12 A. Where I'm living now?

13 **Q. Yes, ma'am.**

14 A. 7204 Forest Avenue.

15 **Q. Kansas City, Missouri?**

16 A. Yes, ma'am, 64131.

17 **Q. Do you live with anyone?**

18 A. My son.

19 **Q. Which son?**

20 A. Junius Morrow.

21 **Q. And -- and what's your phone number?**

22 A. (816) 95-0986.

23 (Reporter clarification.)

24 A. (816) 915-0986.

25 **Q. (By Ms. Peters) Are you employed, ma'am?**



Page 69

1 A. No, ma'am.
 2 **Q. What's your date of birth?**
 3 A. 7/20 -- (indiscernible) --
 4 **Q. Can you repeat that.**
 5 A. July the 20th, 1964.
 6 **Q. Okay. Before we took a break, we were**
 7 **talking about that you saw Wendy Lockett, Felicia**
 8 **Jones, and Star sitting on the front porch of a**
 9 **house that you've identified on a diagram on the**
 10 **night of Larry White's homicide. Do you recall**
 11 **that?**
 12 A. It was an apartment, not a house.
 13 **Q. Sitting on the front porch of an**
 14 **apartment; correct?**
 15 A. Correct.
 16 **Q. And who else did you see on the night of**
 17 **Larry White's homicide in that area other than those**
 18 **women, Larry White, Kiki, Reggie, and Tre?**
 19 A. I don't remember these people name because
 20 I didn't communicate with them. You know, I wasn't
 21 friends with people.
 22 **Q. What do you -- do you remember their**
 23 **nicknames?**
 24 A. (Indiscernible.)
 25 **Q. I'm sorry. Did you say "No"?**

Page 70

1 A. "No."
 2 **Q. Did you see anyone by the name of Debo, or**
 3 **do you recognize the name Debo?**
 4 A. I don't recognize that name.
 5 **Q. What do you recall seeing Felicia Jones do**
 6 **when you saw her on the porch of that apartment**
 7 **building on the night of Larry White's homicide?**
 8 A. After all this went down, I -- I don't
 9 know where she went afterwards, but I -- she was
 10 just sitting there and high with Wendy Lockett. And
 11 there was some other guy out there. I don't
 12 remember their name. I don't recall -- say one was
 13 named June Bug or something like ...
 14 **Q. Okay. Who is June Bug?**
 15 A. I don't even know his -- that's his street
 16 name. I don't know his real name.
 17 **Q. Where did you see June Bug?**
 18 A. He standing on the corner.
 19 **Q. Which corner?**
 20 A. I can't remember which corner it was, but
 21 when I was -- you know when I was walking up, I seen
 22 him. I don't remember which corner it was. It was,
 23 you know ...
 24 **Q. Okay. What was June Bug doing?**
 25 A. He was just talking to somebody. I

Page 71

1 don't -- that's the only thing. He was just
 2 standing there talking to some guy. I don't know
 3 who it was he was talking to. I didn't stop to ask.
 4 I was just trying to do what I was going to do --
 5 where I was going.
 6 **Q. Did you ever have any conversation with**
 7 **Wendy Lockett about what you saw that night?**
 8 A. No, ma'am.
 9 **Q. What about with Felicia Jones? Did you**
 10 **have any conversation with her about what you**
 11 **witnessed on the night of Larry White's homicide?**
 12 A. No, ma'am.
 13 **Q. So let me go back to a week after the**
 14 **homicide, when Amy McGowan first drove up on you,**
 15 **Wendy Lockett, Felicia Jones, and Star. Okay?**
 16 A. Okay.
 17 **Q. Tell me the first thing that happened when**
 18 **Amy McGowan drove up on you.**
 19 A. I can't recall what was all said at that
 20 time, but I just can't remember what was said. I'm
 21 going to be honest.
 22 **Q. I'm sorry. You cut out that last part.**
 23 **Can you say that again.**
 24 A. I said I -- I don't recall everything,
 25 what was said.

Page 72

1 **Q. Was Amy McGowan alone?**
 2 A. Yes.
 3 **Q. Were there any police around?**
 4 A. No, ma'am.
 5 **Q. What do you recall Amy McGowan saying to**
 6 **you?**
 7 A. About the homicide of Larry -- Larry White
 8 and was -- and was showing Mr. Carnes's picture
 9 saying that he -- he's the one that killed Larry.
 10 And that's not true.
 11 **Q. Did -- how did Amy McGowan introduce**
 12 **herself to you? Do you recall?**
 13 A. She just said "Amy McGowan." That's all
 14 she introduced her name. She didn't really say, at
 15 the time, "prosecutor." I don't remember her saying
 16 that.
 17 **Q. Did you know who she was at that time?**
 18 A. No, ma'am.
 19 **Q. Did you ask her who she was?**
 20 A. She said her name was Amy McGowan. That's
 21 how I knew her name, but other than me, you know --
 22 I don't really understand it but -- why she was
 23 there, I don't -- can't tell you.
 24 **Q. Did you know that she was a prosecutor at**
 25 **the time?**



Page 73

1 A. Not until later on when we -- when she
2 talked to me when we were standing there.
3 **Q. When you were standing where?**
4 A. On the corner talking to them.
5 **Q. Okay. So Amy McGowan pulls up in her**
6 **vehicle. What kind of vehicle did she drive? Do**
7 **you recall?**
8 A. I can't remember what it was because it
9 was such a long time ago.
10 **Q. Does Amy McGowan -- did you see Amy**
11 **McGowan get out of her vehicle?**
12 A. Ma'am, she never stepped out of the car.
13 Not at all.
14 **Q. So Amy McGowan pulled up on you, Wendy**
15 **Lockett, Felicia Jones, and Star, and she remained**
16 **in her car?**
17 MR. HILKE: Object to form.
18 A. Yes.
19 **Q. (By Ms. Peters) And what was the first**
20 **thing that was said between the group of you?**
21 MR. HILKE: Objection. Asked and
22 answered.
23 You can answer.
24 A. I'm assuming -- I'm assuming she knew
25 Wendy.

Page 74

1 Can you hear me?
2 **Q. (By Ms. Peters) Yes.**
3 **Why do you assume she knew --**
4 A. I'm assuming -- well, Wendy was the
5 police -- what they want to call them? -- snitch
6 or -- or whatever.
7 **Q. And why do you assume she knew Wendy?**
8 A. Because she walked up to her car.
9 **Q. Wendy Lockett walked up to --**
10 A. (Indiscernible) --
11 THE REPORTER: Stop. Stop. Stop. One at
12 a time.
13 **Q. (By Ms. Peters) Wendy Lockett walked up**
14 **to Amy McGowan's car?**
15 A. Yes, ma'am.
16 **Q. Were you standing there when Wendy Lockett**
17 **walked up to Amy McGowan's car?**
18 A. Yes, ma'am.
19 **Q. Did you overhear any conversation between**
20 **Wendy Lockett and Amy McGowan?**
21 A. No, not really. Not what they was talking
22 about.
23 **Q. Okay. Was there any conversation that you**
24 **heard between Felicia Jones and Amy McGowan?**
25 A. No.

Page 75

1 **Q. Was the first -- between you and Amy**
2 **McGowan, who initiated the conversation? You or Amy**
3 **McGowan?**
4 A. She initiated conversation with me.
5 **Q. And tell me what she first said to you.**
6 MR. HILKE: Objection. Foundation.
7 Go ahead.
8 A. I don't recall all the -- all the stuff
9 that we talked about, but it was -- it was
10 pertaining to the homicide.
11 **Q. (By Ms. Peters) She introduced herself as**
12 **Amy McGowan; correct?**
13 A. Correct.
14 **Q. She didn't tell you who she was; correct?**
15 A. She introduced herself as Amy McGowan.
16 **Q. She told you her name?**
17 A. Yeah, I didn't -- yes.
18 **Q. But you didn't know why she was**
19 **approaching you; correct?**
20 A. Of course.
21 MR. HILKE: Object to form.
22 (Reporter clarification.)
23 A. Correct.
24 (Discussion off the record.)
25 **Q. (By Ms. Peters) So, Ms. Morrow, if I**

Page 76

1 **understand your testimony correctly, Amy McGowan**
2 **pulled up; she introduced herself as Amy McGowan and**
3 **started talking about Larry White's homicide?**
4 A. I'm assuming yes because she didn't talk
5 to me first. She talked to Wendy, and she talked to
6 the other lady first; so I'm assuming that, what
7 it -- what it was really all about because of -- the
8 area got bad. I don't know.
9 **Q. And that's my -- and I apologize. My -- I**
10 **meant for my question to be when Amy McGowan first**
11 **talked to you, she introduced herself as Amy McGowan**
12 **and started talking about Larry White's homicide --**
13 A. Yes, ma'am.
14 **Q. -- correct?**
15 A. Yes, ma'am.
16 **Q. And you didn't know she was a prosecutor;**
17 **correct?**
18 A. Correct.
19 **Q. You didn't know if she was police;**
20 **correct?**
21 A. Correct.
22 **Q. Well, what was going through your mind?**
23 **Who did you think she was?**
24 A. What was going through my mind at the time
25 was people pay -- you know, I know the police



Page 77

1 department pay people to give them information and
2 to be a snitch for them. That was going through my
3 mind because that's what Wendy Lockett was -- a
4 snitch.

5 **Q. Well, how does that relate to who you**
6 **thought Amy McGowan was?**

7 A. Just because of the -- you know, you can
8 tell by people's body formation what the
9 conversation may be talking about, but you couldn't
10 clearly hear what they were saying.

11 **Q. And I believe you testified that Amy**
12 **McGowan had a picture of Keith Carnes during her**
13 **interaction with you this first time?**

14 A. The -- it was the first time. Yes, ma'am.

15 **Q. Right there on the street -- correct? --**
16 **when she drove up on you?**

17 A. She had -- you know, you got the photo
18 lineup book or whatever -- the police department
19 have those. Yes, ma'am, she had pictures not only
20 of him but other people as well.

21 **Q. Okay. So she brought a -- a book of**
22 **photographs. Were they mug shots?**

23 A. Yes, ma'am. That's what you want to call
24 them. Yes, ma'am.

25 **Q. So Amy McGowan had a book of mug shots**

Page 78

1 **with her at this time. Did she show you those book**
2 **of mug shots?**

3 A. Yes, ma'am.

4 **Q. Did you see her show that book of mug**
5 **shots to Wendy Lockett?**

6 A. I don't know what she was looking at, but
7 I know she showed me. I don't -- I can't speak for
8 the other two people. I just can't do that.

9 **Q. Well, did you see Amy McGowan show Wendy**
10 **Lockett anything?**

11 A. She was leaning over in her car. No,
12 ma'am.

13 **Q. And when Amy McGowan showed you this book**
14 **of mug shots, what happened?**

15 A. She -- the Reggie mug shot was in there.
16 Kiki's mug shot was in there, but the other
17 photograph she had of Keith Carnes -- a single
18 photograph of him -- she didn't have it in the mug
19 shot book. She just had a -- the mug shot of them
20 in a book, but then with Keith Carnes, she had a
21 single picture.

22 **Q. And what did she say to you or you say to**
23 **her regarding those photographs?**

24 A. I pointed out Reggie and Kiki as the
25 shooter as I did before but the photograph -- do you

Page 79

1 want me to stop right there or just answer yet --
2 what she said to me about?

3 **Q. Yeah. Please keep going. And I'm only**
4 **holding my ear so -- hand here so I can hear you.**

5 A. Okay. So she told -- she showed -- when
6 she showed me the photograph, she said -- I told her
7 who the shooters that they showed me in the mug shot
8 but -- and she said, "No. This is the man that
9 killed Larry White," and no, he did not. But she
10 also threatened to put me in jail if I did not say
11 that Keith was the shooter.

12 **Q. So all that happened during your very**
13 **first meeting with Amy McGowan there on the street a**
14 **week after the homicide --**

15 A. Yes, ma'am. I was --

16 **Q. -- of Larry White?**

17 A. Yes, ma'am.

18 THE REPORTER: One at a time.

19 A. I was threatened.

20 **Q. (By Ms. Peters) You saw a picture of**
21 **Reggie, Kiki, and Keith Carnes; correct?**

22 A. Correct.

23 **Q. And when is the next time that you talked**
24 **to anyone about the homicide of Larry White after**
25 **this meeting with Amy McGowan?**

Page 80

1 A. I don't recall.

2 MS. PETERS: You okay?

3 THE WITNESS: My throat is dry because I'm
4 talking too long.

5 A. I don't recall, ma'am.

6 MS. PETERS: Are you okay now?

7 THE WITNESS: Yeah. I guess my throat is
8 a little dried up.

9 We can finish.

10 MS. PETERS: Okay.

11 **Q. (By Ms. Peters) When is the next time you**
12 **interacted with Amy McGowan?**

13 A. Jackson County Courthouse building on 12th
14 Street.

15 **Q. Is that the time when Sheriff Anthony --**

16 A. Excuse me.

17 **Q. Is that -- is that the time when a person**
18 **by the name -- a law enforcement officer by the name**
19 **of Anthony from the sheriff's office picked you up**
20 **and brought you to the courthouse?**

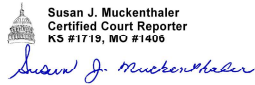
21 A. Yes, ma'am.

22 **Q. Was anyone with Anthony from the sheriff's**
23 **office when Anthony picked you up?**

24 A. No. He was by himself.

25 **Q. And where were you when Anthony from the**



<p style="text-align: right;">Page 81</p> <p>1 sheriff's office picked you up?</p> <p>2 A. I want to say over at my sister's house.</p> <p>3 Q. What's that -- what was that address?</p> <p>4 A. It was on Gregory -- Gregory and</p> <p>5 Cleveland, 71st, in Kansas City, Missouri. I can't</p> <p>6 remember the whole complete address at the time</p> <p>7 because --</p> <p>8 Q. And --</p> <p>9 A. -- at the --</p> <p>10 Q. And how much time after your first meeting</p> <p>11 with Amy on the street did the second meeting at her</p> <p>12 office happen?</p> <p>13 MR. HILKE: Objection. Foundation.</p> <p>14 You can answer.</p> <p>15 A. I don't remember it -- the time lapse.</p> <p>16 Q. (By Ms. Peters) I'm going to ask you to</p> <p>17 ballpark it if you can.</p> <p>18 MR. HILKE: Same objection.</p> <p>19 A. (Indiscernible.)</p> <p>20 Q. Was it day --</p> <p>21 A. (Indiscernible.)</p> <p>22 Q. I'm sorry. Was it a day?</p> <p>23 A. Maybe a -- maybe a month.</p> <p>24 MS. PETERS: Are you okay, ma'am?</p> <p>25 THE WITNESS: No, no, no, no. I'm</p>	<p style="text-align: right;">Page 83</p> <p>1 THE REPORTER: Okay.</p> <p>2 MS. PETERS: Same -- same for Diane</p> <p>3 Peters.</p> <p>4 (The deposition was adjourned at</p> <p>5 3:06 p.m., with the time and location of the</p> <p>6 continuation to be agreed upon by all parties.)</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 82</p> <p>1 being -- my nose is bleeding. You know, I -- my</p> <p>2 medicine does that. I'm -- I need a break.</p> <p>3 MS. PETERS: Okay.</p> <p>4 MR. HILKE: Let's take a break.</p> <p>5 MS. PETERS: Let's take a break.</p> <p>6 THE WITNESS: Okay.</p> <p>7 THE REPORTER: Off the record 3:00</p> <p>8 o'clock p.m.</p> <p>9 (A recess was taken.)</p> <p>10 THE REPORTER: Back on the record at</p> <p>11 3:05 p.m.</p> <p>12 MR. HILKE: So Ms. Morrow has requested</p> <p>13 that we adjourn her deposition to be continued in</p> <p>14 person next Wednesday at Ms. Peters's office in</p> <p>15 Kansas City. So we'll leave the deposition open at</p> <p>16 this time and pick it up again Wednesday at</p> <p>17 9:00 a.m. Ms. Peters, is that correct?</p> <p>18 MS. PETERS: That is correct. Ms. Morrow,</p> <p>19 I hope you get to feeling better.</p> <p>20 THE WITNESS: Yes, ma'am. Thank you.</p> <p>21 MR. HILKE: All right.</p> <p>22 THE REPORTER: Okay. Can you tell me if</p> <p>23 you want orders for this transcript?</p> <p>24 MR. HILKE: Yeah, plaintiff will take a</p> <p>25 regular e-tran, please.</p>	<p style="text-align: right;">Page 84</p> <p>1 CERTIFICATE OF REPORTER</p> <p>2</p> <p>3 I, Susan J. Muckenthaler, a Certified Court</p> <p>4 Reporter of the State of Missouri, do hereby</p> <p>5 certify:</p> <p>6 That prior to being examined, the witness</p> <p>7 was first duly sworn;</p> <p>8 That said testimony was reported by me at</p> <p>9 the time and place hereinbefore stated and was</p> <p>10 thereafter reduced to typewriting under my</p> <p>11 direction;</p> <p>12 That the foregoing transcript is a true</p> <p>13 record of the testimony given by said witness;</p> <p>14 That I am not a relative or employee or</p> <p>15 attorney or counsel of any of the parties or a</p> <p>16 relative or employee of such attorney or counsel or</p> <p>17 financially interested in the action.</p> <p>18 witness my hand and seal June 17, 2024.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <div style="text-align: center;">  <p>Susan J. Muckenthaler Certified Court Reporter KS #1719, MO #1405</p> <p>Susan J. Muckenthaler Missouri Supreme Court Certified Court Reporter</p> </div>



Page 85

1 ERRATA SHEET

2 RE: Keith Carnes v. Robert Blehm, et al.

3 PG/LN Correction and Reason for Change

4 _____

5 _____

6 _____

7 _____

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23 _____

24 Lorianne Morrow

25 SJM

Page 86

1 SIGNATURE PAGE

2 RE: Keith Carnes v. Robert Blehm, et al.

3

4 _____ I certify that I have read my testimony and

5 request that NO changes be made.

6

7 _____ I certify that I have read my testimony and

8 request that the above changes be made.

9

10

11

12 _____

13 Lorianne Morrow

14

15

16 Subscribed and sworn to before me this

17 _____ day of _____, 20____

18

19

20 _____

21 Notary Public

22 State of _____

23 County of _____

24 My commission expires _____

25 SJM



Exhibits	29th-wabash-olive 63:25	A	approximately 4:4
Ex (1) 3:6,7 8:15 65:25	3	a.m. 82:17	April 48:9,13,20
(30 51:16	abil- 41:2	area 8:10,16,18,19 9:4,5,14,19 10:1,4,9,11 13:18 36:6 61:5,25 62:11 63:24,25 64:20 69:17 76:8
(816) 68:22	30th 9:20 49:25	ability 40:24 41:4	assume 74:3,7
1	31st 4:4	accurate 6:14,22	assuming 43:16 44:12 73:24 74:4 76:4,6
1	38 15:7	accurately 7:7	attorneys 5:9 39:9
1 8:15 65:25	3:00 82:7	address 68:11 81:3,6	Avenue 8:10,17 9:4 19:9 68:14
12th 80:13	3:05 82:11	adjourn 82:13	B
1964 69:5	3:06 83:5	adjourned 83:4	back 7:12 15:8 19:13 24:10,21 30:9 36:2 38:21 40:24 50:9 52:20 54:4,15 64:18 68:10 71:13 82:10
1:07 4:5	4	administering 4:14	bad 5:25 6:1 18:18,24 37:1 58:25 76:8
2	4:23-cv-00278-rk 4:8	affidavits 23:23 24:3	ballpark 81:17
20 51:16 62:21	4th 42:1	afraid 35:21	barely 26:8
20- 15:20 47:4	5	afternoon 4:1 5:3	basement 17:6
20-plus 23:23	5th 47:23	agree 4:12,17,21	basically 43:23
2003 8:9 9:1,3 19:13 25:23 36:2, 11 41:4 49:21 50:9 54:4	6	agreed 83:6	bathroom 39:7,12
2004 41:4	6 8:9 9:3	ahead 11:6 15:16 24:16 25:19 39:14 75:7	beginning 37:20
2005 24:10,18,21,23 38:21 41:5	64131 68:16	AK-47 15:2	behalf 4:20 37:22
2014 37:12	6th 49:21	alley 19:4,6,9,14 20:15	bell 52:23
2015 37:12	7	alleyway 67:16	Benton 9:8 10:13 55:6 56:8
2016 37:13	7 8:9 9:1	Amy 4:19,21 5:11 26:13,16,19, 23 27:1,14,21 28:4,9,25 29:15 30:5,11,16 31:14 34:25 35:2 45:4 55:12 56:1 57:11,12,14 60:23 62:12,23 63:11,16 64:3 71:14,18 72:1,5,11,13,20 73:5,10,14 74:14, 17,20,24 75:1,2,12,15 76:1,2,10,11 77:6,11,25 78:9,13 79:13,25 80:12 81:11	big 29:24 54:3
2021 59:16,23 60:11,14	7/20 69:3	answering 12:19	binding 4:14
2023 47:3	71st 81:5	Anthony 28:14,19 80:15,19,22, 23,25	birth 69:2
2024 4:4 47:6,17 48:13,17,20	7204 68:14	anymore 65:15	bit 15:8 21:25 59:22
20th 69:5	8	apartment 15:12 19:5 29:25 65:1,14 66:5,6,9 67:7,17,20 68:6 69:12,14 70:6	bleeding 82:1
22 15:7	816 915-0986 68:24	apartments 18:22,23 22:6,22 23:3 68:5	Blehm 4:8
2404 22:7	9	apologize 64:11 76:9	block 14:15 16:6
2408/2410 19:5	95-0986 68:22	approaching 75:19	blocks 9:11
2506 66:10,22	9:00 82:17		Board 40:8
2604 9:8			body 77:8
26th 9:7 55:6 56:8			book 29:5 77:18,21,25 78:1,4, 13,19,20
2846 19:6 20:16,20 66:4 67:15			books 34:4
29th 8:10,16 9:4 10:19 15:20,24 16:5 17:8 19:4,5 21:9 22:7 25:5 36:6 53:23,25 66:10,22			



bottom 10:23	church 10:20 15:13 16:13,18 17:1 20:6 21:21 65:2 67:7,8	correctly 40:17 76:1	describe 16:17 60:25	
Boulevard 9:8	City 5:10 32:9 40:8 42:10 44:12 54:1 68:15 81:5 82:15	corrupt 33:7	destroying 31:11	
break 39:6,12 69:6 82:2,4,5	clar- 55:20	counsel 4:11	detectives 5:10 40:9	
Brenda 50:4,6 54:11,13,18,21 55:3,8,11,24 56:3,12,13,17,24 57:5,8	clarification 68:23 75:22	County 28:12,16,20 80:13	diagram 65:19 67:11 69:9	
bring 34:2	clarify 6:2	couple 22:18 23:15 26:24 63:4, 5,9	Diane 4:18 6:9 39:18 83:2	
brought 77:21 80:20	clean 24:19	court 4:2 5:17,21 12:7 35:24 38:18	direction 9:18 16:9 20:2,4,7 22:6 25:12	
Bug 70:13,14,17,24	clear 53:24 55:22 66:19	courthouse 28:12,17,21 80:13,20	discuss 44:24 45:14,22 47:20 48:17,21	
building 15:12 65:1,2,9,15 66:6,9 67:7,14,17,21 70:7 80:13	Cleveland 81:5	cover 17:1,4,10 19:23 25:17,21, 24 26:5	discussed 47:17,22,24	
buildings 67:16	Close 67:14	crack 65:7	Discussing 45:23	
built 42:17	closer 67:6	criminal 22:17 23:14,16,19 24:8,9,23 30:25 34:22	discussion 6:11 45:20 51:6 68:7 75:24	
bullets 32:3	cocaine 65:7	cross- 67:6	documents 24:2 46:10	
business 10:15	Commissioners 40:9	crossing 67:6	dope 13:24 14:2	
<hr/>		crying 54:15	downstairs 45:17	
C		cul-de-sac 34:12	downtown 32:9 42:7,8,10 44:11	
call 18:20 28:11 34:12 43:2 46:17,21,25 47:21 48:6,12,16,21 52:19,20,21 53:12 67:16 74:5 77:23	commit 29:16,18 34:19	cut 15:13 71:22	dried 80:8	
called 27:25 42:21,22,24 53:10	committed 29:22 32:24	cutting 20:6	drive 73:6	
car 73:12,16 74:8,14,17 78:11	communicate 69:20	<hr/>		
Carnes 4:7,17 5:8 24:11,24 25:5 27:9,12 29:4,8,22 30:17 31:7 35:18 36:10 37:17 38:7,21 40:10 43:22 44:3 45:3 57:20 58:2,5,9,13, 17 59:7,8,18,24 60:15 77:12 78:17,20 79:21	computer 33:24 34:8	D		
Carnes's 24:9 30:25 34:22 37:22 44:23 45:2 59:16 72:8	confrontation 10:16	D-MAN 14:14	driveway 19:8,10,14 20:15,20	
carrying 14:21,24 15:5	connection 5:25 67:25	date 4:3 41:21 69:2	drove 62:12,23 63:11,17 64:3 71:14,18 77:16	
case 4:8 7:8 38:18 65:14	contact 18:7,11 27:1	day 9:13 44:8 81:20,22	drug 18:21 27:10 29:25	
casing 29:11,12 31:19 65:14	continuation 83:6	days 26:24 55:10 62:15,19,20,22 63:1,4,5,9	drugs 27:11 31:2,5,8	
casings 31:14,23 32:1	continue 39:13	dealer 13:24 14:2 29:25	dry 80:3	
caused 49:10	continued 82:13	dealers 18:21	duly 4:23	
charged 27:10	control 7:12	Debo 70:2,3	<hr/>	
chase 20:14,18,19 21:5 67:10	conversation 27:7,8,13 43:19 47:8,10,12,14,16 48:3 55:12 56:1, 5,7 71:6,10 74:19,23 75:2,4 77:9	deceased 52:7,8	E	
chased 15:5 24:11 25:5	conviction 49:15	decide 30:24	E-R-A-N 50:21	
chasing 10:17 11:2,9 13:19 14:20 15:9 16:21 20:12 21:25 23:6 67:10	corner 10:19 11:25 15:22 16:5 53:23,25 67:3 70:18,19,20,22 73:4	defendant 4:21 23:14	e-tran 82:25	
	correct 7:15,16,18,19 10:1 11:2 13:19,20 16:15,16 19:12,24,25 23:24,25 24:24,25 32:1 41:8,9 43:4,5 44:3 46:22,23 48:4,5,15 49:21,22 54:4 60:17 69:14,15 75:12,13,14,19,23 76:14,17,18,20, 21 77:15 79:21,22 82:17,18	defendants 4:19 5:8	ear 79:4	
		department 5:11 77:1,18	earlier 15:18 40:13 41:7 49:20 63:3 66:15	
		deposition 4:6,13 5:13,16 6:3 46:18 47:11,17 48:1,13 63:3 82:13,15 83:4	east 10:12,13 16:11 19:5,14 21:7,23 22:7 25:4 66:10,22	
			eating 38:24	
			elaborate 40:19	
			employed 68:25	



ended 16:14,17,23	felt 30:22	good 4:1 5:3,6 7:4 8:20,22 13:5 16:6 36:21	health 6:13,21,24 36:21
enforcement 28:18,21 80:18	female 34:21 62:3,10	Grandma 52:21 53:10	hear 5:3,5 6:16 11:16,17 20:10 25:20 26:6,8 40:3,5 74:1 77:10 79:4
entailed 47:9,10	fence 20:21,24,25	grandmother 51:7	heard 19:18 20:1,3,8,9 22:4,11, 20 74:24
Eran 50:19,20 51:2	filed 40:11	grandmother's 52:15 53:8	hearing 19:17 38:7 59:6,16,23 60:11,14
Eran's 50:22	fine 5:5 12:11	Gregory 81:4	heart 38:15
Eric 50:19,22	finish 80:9	grew 8:19 52:9,12	helping 37:25
Eric's 51:1	fire 20:13	group 73:20	high 64:25 65:6 66:9 70:10
et al 4:8	firing 23:8	grow 8:24 51:17,20	Hilke 4:16 5:2,7 6:9,12 13:3,16 24:16,20,22 25:19 26:13 39:3,4,9, 12,17 41:8,11,20 42:3 43:14,19 44:13 45:10,14,19,24 46:8,13,16, 17,22,25 47:18,20 48:3,12,17,21 49:4 57:2 59:9,11,19 60:1,7,19 61:2 63:13 65:19,22 73:17,21 75:6,21 81:13,18 82:4,12,21,24
evening 8:11 9:15,16 23:9	firm 49:4	guess 8:8,9 22:13 33:6 80:7	Hilke's 49:3
event 37:3	Fish 17:22 21:6,7,8	guilt 38:20,23	hip 47:24
events 49:18	flip 34:5	gun 10:17 14:25 15:1 20:13 31:17 65:14	hit 21:20 32:4
EXAMINATION 5:1 40:6	Forest 68:14	gunfire 16:25	holding 14:21 79:4
examined 35:23	forever 10:21	gunshot 22:5,21	home 5:15
excuse 12:16 13:12 25:25 44:20 55:15 67:22,24 80:16	forget 68:11	guy 27:19 70:11 71:2	homicide 40:16 48:18,22 49:2, 18 55:25 56:4,11 58:24 60:23 61:25 62:12,16,23 63:12,17 64:19, 21,24 69:10,17 70:7 71:11,14 72:7 75:10 76:3,12 79:14,24
exhibit 8:14,15 65:25	form 25:18 61:2 63:13 73:17 75:21	guys 48:10 66:14	honest 6:14 71:21
expect 39:9	formation 77:8		hope 82:19
explain 21:17	foun- 59:9		hotel 42:9,13,15,16,20,25 43:3, 7,20 45:10,20 46:25
externally 4:9	found 22:15 65:13	H	house 9:7 19:5 29:10,12 31:18 49:20 54:3 56:7 58:12,16 65:13 66:5 69:9,12 81:2
eye 18:7,11	foundation 57:2 59:13 75:6 81:13	habeas 38:7 59:6,16,23 60:11, 14	hung 63:22
F	friend 9:6 55:7	half 34:14	hurry 10:18
face 18:15	friend's 49:20,23	hand 79:4	
facts 48:18,22	friends 53:16,19 69:21	handbook 34:4	I
fair 12:7 14:16	front 18:14 23:2 35:14 66:21 69:8,13	handgun 15:7	identified 58:9,13,17 69:9
familiar 8:18,21 14:16 19:6,9	full 13:4	Haner 4:20	identify 4:11 35:18 58:5 59:8, 18,24 60:15 61:9 65:25
family 51:8,11,14,18 53:17 54:2 56:15,18,22,25 57:16,19,23 58:1, 4,8,11,19 59:2,7,17,24 60:14	G	Hanging 64:9	
farthest 21:23	G-A-R-D-N-E-R 50:25	happen 10:5 81:12	
February 47:2,3,4,6,16,23 48:16,17	Gardner 50:24	happened 7:1 8:25 40:16 46:4, 6,7 61:6 71:17 78:14 79:12	
feel 18:10 30:20 38:12,20,23 58:21 59:3	general 63:6	happening 10:8,22 25:11 29:2 67:11	
feeling 82:19	girl's 61:13,14 62:2	he'll 48:10	
Felicia 61:19,22,24 62:10 63:18 64:2 66:17,21 69:7 70:5 71:9,15 73:15 74:24	give 6:5,14,22,25 13:8 38:5 46:17 62:25 63:2 77:1	heading 10:11 15:17	
fell 17:18,21,22	giving 24:22	headquarters 32:11,12	
	glitch 55:17	heal 47:25	
	Goldie 36:4,8,9	healed 48:8,9	
		healing 48:14	



illness 40:23 41:3**important** 44:19**impression** 40:15**incorrect** 62:25 63:2**indiscernible** 13:11 55:14
67:18,20 69:3,24 74:10 81:19,21**information** 77:1**initiated** 75:2,4**inter-** 11:14**interact** 26:19,23**interacted** 14:4 36:11 80:12**interaction** 29:2 30:5 77:13**interfere** 40:23 41:3**internet** 67:25**interruption** 13:13**interview** 32:8**interviewed** 32:5,16 33:15**introduce** 72:11**introduced** 72:14 75:11,15
76:2,11**involve** 20:15**issue** 6:21 51:6

J

Jackson 28:12,16,20 80:13**jail** 31:2,5 79:10**Jones** 61:20,22,24 62:10 63:18
64:2 66:17,21 69:8 70:5 71:9,15
73:15 74:24**Josh** 4:20**Juanita** 52:18,23,24,25 53:2**judge** 35:15**July** 69:5**jump** 20:21**jumped** 21:1**June** 70:13,14,17,24**Junius** 68:20

K

Kansas 5:10 32:9 40:8 42:10
44:12 54:1 68:15 81:5 82:15**Keith** 4:7,17 5:8 24:9,11,23 25:5
27:9,12 29:22 30:17,25 31:7 34:22
35:18 36:10 37:17,22 38:7,21
40:10 43:22 44:3,23,25 45:2,3
49:13 57:20 58:2,5,9,13,17 59:8,
16,18,24 60:15 77:12 78:17,20
79:11,21**kids** 31:9**Kiki** 11:3,5,7 13:19 14:1 15:5,9
20:19 21:24,25 27:25 29:20 33:2,4
34:19 54:25 57:1 67:9 69:18 78:24
79:21**Kiki's** 78:16**kill** 57:1**killed** 24:12 25:23 26:19 33:9
37:4 46:5 54:25 72:9 79:9**kind** 15:1 73:6**kingpin** 18:20**knew** 14:12 31:20 36:16 51:8
62:8 72:21 73:24 74:3,7**knowledge** 7:7,10

L

lady 61:12 66:15 76:6**land** 29:12 32:3**landed** 29:11**lapse** 81:15**Larry** 7:18 8:5 10:16 11:2,9,11,
13 13:19 14:20 15:6,9 16:1,3,9
17:12,17,25 18:1 21:11,23 22:17
23:6,15,23 24:11 25:4,22 26:18
32:6,20 33:9 37:3 38:10 40:16
46:4 48:18,22 50:9,12,13 51:3,14,
23,24 52:12,13,15 53:4,5,7,16
54:7,8,10,22 55:1,3,9,25 56:4,11,
14,18,19,22,24 57:1,10,17,20,23
58:1,4,8,11,15,19,23 59:2,3,7,17,
23 60:14,22 62:16 64:19,20,24
67:10 69:10,17,18 70:7 71:11
72:7,9 76:3,12 79:9,16,24**Larry's** 13:21 52:3**Latahra** 37:8,11,15,21 43:13,
15 49:7,9**law** 28:18,21 49:4 80:18**lawsuit** 5:8,9 40:10 45:3,7,9,23**lawyer** 44:23 45:2**lawyers** 5:7**lead** 17:6**leaning** 78:11**learnt** 37:19**leave** 8:22 34:10 82:15**left** 46:16**legal** 22:13 36:7**lie** 37:21**lift** 38:14**lineup** 77:18**listen** 30:23**live** 18:4,24 44:12 51:13 53:21
55:6 68:17**lived** 9:7,23 14:12 49:25 51:12
53:25 54:2,4 64:5,6**living** 68:12**lobby** 45:13,15**located** 15:10 66:10**location** 83:5**Lockett** 61:11,15,24 62:10
63:18,21,22 64:20,23 65:20 66:2,
3,8,13,21 69:7 70:10 71:7,15
73:15 74:9,13,16,20 77:3 78:5,10**long** 14:13 22:24 26:22 33:17
41:25 46:12 47:12,13 73:9 80:4**looked** 22:21 24:1,4 33:14**Lorianne** 4:7,22 36:14 56:25**lose** 31:8**lot** 5:23 15:13 16:14,18 17:2
18:23 20:6 21:20 33:7 38:15 61:6
62:6 64:15 65:3 66:7**louder** 6:17**lupus** 40:22,23 41:3

M

made 18:10**main** 61:16 62:8**make** 5:22,24 7:23 13:5 18:7
24:18 38:17 63:23 67:3**Makes** 5:23**man** 10:17 79:8**map** 8:15 9:24 12:1 19:3**mark** 8:14,15**matter** 4:7 43:23 44:24**matters** 45:14**Mcgowan** 4:19,21 5:11 26:14,
16,19,23 27:1,22 28:25 29:15
30:5,12,16 31:15 34:25 45:4 55:13
56:1 57:12,15 60:23 62:12,23
63:11,16 64:3 71:14,18 72:1,5,11,
13,20 73:5,10,11,14 74:20,24
75:2,3,12,15 76:1,2,10,11 77:6,12,
25 78:9,13 79:13,25 80:12**Mcgowan's** 28:4,9 74:14,17**meaning** 9:14 24:2,9 36:24**meant** 6:9 24:21 40:15 76:10**medication** 6:13,21**medicine** 82:2**meet** 42:13,19,24 43:7,20 44:6,
9,10,16,21,22**meet-** 61:4**meeting** 46:12,16,24 60:25
61:4 79:13,25 81:10,11**member** 57:16,19**members** 51:17 53:17**memory** 36:21,25 37:5**mentally** 39:1**mentioned** 5:6 16:13 19:17
31:13 39:5 66:15**met** 37:11,15 41:22 42:3 43:2
45:10**Michael** 49:24 51:25 52:13
53:20,21,24 55:7**Michael's** 52:1

middle 12:20
mind 65:16 76:22,24 77:3
minding 10:15
mine's 9:7
minute 8:14 23:13
minutes 46:14 47:14
Missouri 40:8 42:11 54:1
 68:15 81:5
Missouri-certified 4:2
mom 51:21,22 52:10,11,12,24
 53:1,4
mom's 52:3
moment 57:22
money 58:12,16
moniker 36:1
monitored 4:10
month 24:21 42:2 81:23
morning 9:14
Morrow 4:7,22 5:3 7:14 36:14
 39:4,18 50:7,23 51:2 56:25 65:24
 68:3,9,20 75:25 82:12,18

N

named 22:14 28:19 51:24 53:2
 70:13
nature 46:18

needed 39:2 44:24
neighbor- 27:2
neighborhood 13:25 14:3,12
 18:5,17 27:3 51:12,14 64:5,6
nice 44:16,20,22
nickname 36:2,3,17,18
nicknames 69:23
niece 9:23 49:25 54:10,11 55:3,
 11,24 56:3,12,17,21,24 57:8
niece's 50:3
night 10:4 14:5 38:10 46:4
 49:18 64:19,20,24 66:20,25 69:10,
 16 70:7 71:7,11
nighttime 32:18
north 9:25 10:12 19:4
northeast 15:17,21
nose 82:1
noticed 13:18 15:9
number 43:10,15,17 68:21

O

oath 4:14,24 5:15 59:23 60:17
object 4:19 25:18 63:13 73:17
 75:21
objection 4:13 57:2 59:9,12,
 13,19 60:1,7,19 61:2 73:21 75:6
 81:13,18
observe 17:10 22:22
observed 17:13 20:14
occasion 49:10,12
occasions 28:6,7
occur 28:6
occurred 62:1,12,15
October 8:9 9:1,3 24:10,18
 25:23 36:2,11 49:21
off- 34:12
offer 58:8,12
offhand 52:6
office 5:18 28:4,10 29:1,15 30:5
 31:16 34:13 80:19,23 81:1,12
 82:14

officer 4:13 28:19,22 33:7 80:18
officers 5:10 32:6,16 33:8,14,19
 34:1 40:10
oldest 50:15,18 51:5
Olive 16:5 53:23,25
open 82:15
open-ended 30:7
orders 82:23
overhear 74:19
overturned 49:16

P

p.m. 4:5 82:8,11 83:5
parking 15:13 16:14,18 17:2
 20:6 21:20 65:3
Parson 35:3
Parsons 35:4,5,13,17,22
part 20:14 21:4 29:11 71:22
parties 83:6
pass 61:22
passed 61:12,15
past 36:19
pause 12:21,22 13:13 53:14
pay 58:8,12,16 76:25 77:1
people 14:12 18:5,22,24 23:2
 28:11 29:25 61:7,8,10 62:6,8
 64:15,16 69:19,21 76:25 77:1,20
 78:8
people's 77:8
person 22:13,16 41:17,22 42:4
 43:3 44:1 45:16 54:7,9 56:10 57:9
 60:22 61:16,18 80:17 82:14
pertaining 75:10
Peters 4:18 24:15,17 25:18
 39:18,19,22,25 40:3,7 41:2 45:1
 51:10 53:15 55:20 57:4 59:15,21
 60:2,10,21 61:9 63:11,16 65:16,
 18,24 68:2,9,25 73:19 74:2,13
 75:11,25 79:20 80:2,6,10,11
 81:16,24 82:3,5,17,18 83:2,3
Peters's 82:14

phone 41:14,16 43:2,4,6,10,14,
 19,25 44:14 46:21,25 47:12,21
 48:3,6,12,16,20 68:21
photo 29:8 77:17
photograph 78:17,18,25 79:6
photographs 46:8 77:22
 78:23
physically 38:25
pick 28:12,22 82:16
picked 29:7 80:19,23 81:1
picking 29:7
picture 29:4 31:18 40:1 72:8
 77:12 78:21 79:20
pictures 29:7 31:17 77:19
pistol 15:3
place 32:8 44:8,10
plaintiff 4:16 5:7 82:24
plant 31:8
planting 31:2,5
point 7:10 21:6,13 38:16
pointed 78:24
police 5:11 32:5 33:8 34:16
 40:9,10 45:3 72:3 74:5 76:19,25
 77:18
porch 65:6,9 66:9,13,22 69:8,13
 70:6
possession 27:10
prepared 6:5
present 8:10 56:5
pressured 35:18,23
previously 8:7
printed 33:24
prior 51:14
private 56:9
proceed 5:16
promise 37:24
promises 7:23
Pros- 16:4
prosecutor 26:17 34:21 45:4
 72:15,24 76:16



Prospect 9:12 10:19 15:23	69:18 78:15,24 79:21		signed 23:22 33:23
pull 65:19	Reginald 34:18	S	single 78:17,21
pulled 29:5 61:6 73:14 76:2	regular 82:25	safety 10:24	sir 17:3 31:1 32:2
pulls 73:5	relate 77:5	scared 18:12	sister 51:8 53:2,5
put 59:12 79:10	relating 7:8 43:22 58:23 59:3	school 50:13,15 51:4	sister's 81:2
Q	relationship 14:17	screen 6:10 8:13,17 39:19	sit 10:20 33:25 45:13,19
question 6:1,2 11:18,20 12:20 13:4 25:20 26:1 55:21 59:1,21,22 60:6 62:9 64:7 76:10	remained 73:15	sense 5:22,23	sitting 10:20 34:11 65:6,10 66:12,21 67:8 69:8,13 70:10
questions 5:25 8:24 34:22 35:5,7,9,11,14 39:5,10 40:13 43:22,24 44:3 45:25 48:25 57:14 59:1	remember 7:7,9 8:5 10:8,10 23:11 24:22 25:7 26:22 29:2,3 31:4 33:14,16 35:10 37:7,10,13 41:21,24 42:2,16,18 46:3,5 49:1, 23 52:4,5,16 53:7,13 60:16 61:19 62:17 69:19,22 70:12,20,22 71:20 72:15 73:8 81:6,15	set 44:8,10	slow 13:6
quick 55:15	remembered 7:18	setting 47:17	Smith 37:8,11,15,21 49:7,9,11
R	repeat 68:2 69:4	shaking 26:10	smoothly 5:14
ran 18:21	replacement 47:24	shaky 67:25	snitch 74:5 77:2,4
reached 65:2	reporter 4:1,3 5:21 12:7,16,18, 23,25 13:2,12 26:12 41:1 44:20 53:13 55:15 63:10 67:22,24 68:23 74:11 75:22 79:18 82:7,10,22 83:1	share 8:13	son 50:16 68:18,19
reaction 25:15 30:11	reporter's 5:18	shared 6:10	sons 50:13,14,18 51:5
real 28:2 36:14,17 37:20 55:15 62:2 64:16,17 70:16	represent 4:12 40:8	shell 29:10,12 31:14,19,23 32:1 65:14	south 9:25 10:13
reason 6:3,12,19 7:5,6	represented 5:9	sheriff 28:13 80:15	southwards 20:20
reasons 36:21	representing 8:16	sheriff's 80:19,22 81:1	speak 26:11 27:4 49:10 63:6 78:7
recall 23:14 24:8 25:3 34:21 35:7 38:6 45:8 46:15 52:5 60:10, 12 64:2,8 65:9 69:10 70:5,12 71:19,24 72:5,12 73:7 75:8 80:1,5	reputation 18:16,18,19,24 31:11	shift 32:19	speaking 56:11 63:7
recently 6:20 22:15	requested 82:12	shoot 17:24,25 18:1	specific 24:21
recess 68:8 82:9	reviewed 23:18	shooter 25:12 27:13,18,22 33:6 57:24 58:2,6,9,13,17 59:8,18,25 60:15 78:25 79:11	specifically 27:21 45:24
recognize 70:3,4	Rickey 50:19,22	shooters 21:12,14 79:7	spell 50:20
record 4:3,12 6:11 24:19 51:6 59:12 65:17 66:19 68:7,10 75:24 82:7,10	Rickey's 50:24	shooting 25:11,16 26:22,24 27:9 29:9,16,19,23 32:6,24	spend 22:24
recorded 4:10	rifle 15:3,4	shot 16:23 17:12 20:8 23:15 24:11 25:23 26:18 29:6 37:4 78:15,16,19 79:7	split 34:13
recording 4:9	right-hand 65:12 67:3	shots 19:17 20:1,3,4,10 77:22,25 78:2,5,14	spoke 47:5 49:6,9 57:8 60:22
reference 21:6	ring 52:23	show 29:6 31:13 46:8,10 58:11 65:19 67:11 78:1,4,9	spoken 7:14 49:3
Reg- 11:4	Robert 4:8	showed 29:10 78:7,13 79:5,6,7	stair 17:5
Reggie 10:16 11:2,3,5,7 13:18, 23,24 14:20,21 15:9 18:1,6,16 20:19 21:24,25 27:23,25 29:20 33:2,4 34:19 54:25 57:1 67:9	room 45:13	showing 29:3 72:8	stairs 10:23
	row 68:5	sic 35:3 40:22	stairwell 17:5,6,7
	run 16:9 19:14 25:4,12	sick 7:10 25:9 38:16 40:14,15	standing 16:4 61:7,10,14,25 62:5,11 65:5 66:6,8 70:18 71:2 73:2,3 74:16
	running 10:22 16:11,21,24 21:14,23	side 9:11 10:13 15:21 67:5	stands 37:4
		sidewalk 20:6	Star 62:3,11 63:18 64:7,8,14 66:14,21 69:8 71:15 73:15
		sign 33:19,22 34:2	Star's 64:11
			start 8:8 30:13
			started 11:13 76:3,12
			statement 33:20,22,23 34:1,2



stayed 42:16
staying 55:5
step 13:17 30:9 65:1
stepped 73:12
stop 67:24 71:3 74:11 79:1
street 8:10,16 9:4,12 10:14,17, 19 15:11,24 17:8 19:4,5 20:5 21:9 22:7 25:5,15 27:24 66:4,10,22 67:2 70:15 77:15 79:13 80:14 81:11
street all 67:4
streets 30:3
strike 9:2 58:20,24
strong 6:20
stuff 75:8
surgery 47:23 48:14
Susan 4:2
sworn 4:23 5:15
systematic 40:22

T

taking 31:13
talk 5:20 6:17 8:23 12:8 13:6 35:13 44:13 48:10 55:8,11,24 57:16 76:4
talked 7:21 8:1 28:25 29:14 41:7,10,19 43:3,6,8 54:7,9 55:2, 14,16 56:3,10,15 57:9 73:2 75:9 76:5,11 79:23
talking 20:16 37:16,17 44:15 45:17 56:9 61:18 63:23,24 69:7 70:25 71:2,3 73:4 74:21 76:3,12 77:9 80:4
tall 20:25
tearing 38:25 39:1
technical 51:6
telling 29:21 30:17,18 33:10,11, 12
ten 47:15
terms 16:14
testified 4:23 8:4,6 22:17 23:16,22 36:19 38:13 41:7 49:19

60:5,8,13 77:11
testify 7:7 38:17 59:6,15,22 60:16,20
testifying 38:6,20
testimony 6:6,15,22,25 24:10, 23 25:4 48:2 60:11 76:1
thing 10:7 34:13 71:1,17 73:20
things 5:14 7:9 8:6 12:12 38:15 39:16
thinking 53:1 61:23
Thirty 46:14
Thomas 34:18
Thompson 49:24
thought 29:24 30:17 33:11 57:24 58:2 77:6
threaten 7:25 38:2 58:19
threatened 31:1,2,5 58:21 59:3 79:10,19
throat 80:3,7
ti- 64:18

Tim 51:24 52:1,13 53:20,21,24
time 4:4 5:21 7:10 9:5,13,16,23 11:22 12:8 13:17 14:13 15:10,24 16:2,10 18:17 20:2,9 22:7,9,20,22, 25 23:6,8,19,21 24:1 25:8,9,16 26:12 28:25 29:9,14 30:14 31:2,5, 9 32:17 33:17 40:16 41:1,19,22 42:4 43:8 44:8,14 48:19 49:1,6 53:9,14,15,22 62:5,24 63:10,21 64:3,4,8 71:20 72:15,17,25 73:9 74:12 76:24 77:13,14 78:1 79:18, 23 80:11,15,17 81:6,10,15 82:16 83:5
times 8:4 19:18 23:22 28:8 36:20 41:10,12,13,17 43:4
today 5:14 6:3,6,15,23 7:8 37:1 63:3
Today's 4:3
told 27:18,19,23 30:12,16,20,24 31:12,18,25 33:2,3,8 34:17 42:21 44:2 45:1,8 48:7,9 54:14,25 56:16, 18,21,23,24 57:5,6 59:7,17,24 60:15 75:16 79:5,6
touch 46:19

town 17:22 21:6,7,8 42:21 44:11
transcript 23:19 24:6 25:9 82:23
transcripts 24:2
traumatizing 54:17
Tre 22:10,11,14,22 23:5,8,14 24:9 33:9 36:10 69:18
trial 22:17 23:15,16,19 24:2,7,9, 10,23 30:25 34:23 35:6,11 46:6 49:13,14,15
true 6:22,25 25:1 36:22,23 72:10
truth 5:16 7:20 38:9,12 40:24 41:4
turn 67:3
type 34:8
typed 34:1,6,7

U

Uh-huh 12:17 13:15 15:19 21:10,19 32:13 42:23 50:8
ultimately 17:17 30:23
uncle 51:24
uncles 51:9,21,22 52:10,13
uncomfortable 30:22
understand 5:18,24 6:2 9:24 12:2,3,14 13:1,9 40:17 68:1,4 72:22 76:1
understanding 12:1 37:15
unusual 10:5,7
upset 54:15

V

vacant 66:7
vehicle 73:6,11
versus 4:7
victim 23:6
video 4:9
videoconference 4:15

W

Wabash 8:10,16 9:4,21 15:23 16:4 19:6,9,15 20:16,20,23 36:7 50:1 66:4 67:15
wait 11:18 13:4,5 59:11
waiting 45:15
walked 10:8 67:2 74:8,9,13,17
walking 10:3,10,14,15 61:5 67:1 70:21
Wally 4:16 5:6 24:15 41:8 65:16
wanted 30:3,13,18,19,21 43:21 44:2
watch 23:1
watching 22:25
wave 39:22
weapon 23:9
Wednesday 82:14,16
week 63:5,9,12,17 71:13 79:14
weekday 62:18
weekend 62:18
Wendy 61:11,15,24 62:10 63:18,21,22 64:6,19,23 65:20 66:2,3,8,13,20 69:7 70:10 71:7,15 73:14,25 74:4,7,9,13,16,20 76:5 77:3 78:5,9
west 16:7 21:25
westward 22:5
white 13:22 21:11 23:6,15,24 25:23 26:18 37:3 38:10 48:18 50:4,10,12,13 51:3,11,14,18,24 52:2,13,23,25 53:16,17,20,21,25 54:7,8,10,11,13,18,21,22 55:3,4,8, 9,11,24,25 56:3,4,11,12,14,17,24 57:1,5,9,10,16,17,19,20 59:4 62:3, 10 66:20 67:10 69:18 72:7 79:9, 16,24
White's 7:18 8:5 22:17 32:6,20 40:16 48:22 51:15,23 52:12,13,15 53:4,5,7 56:18,22,25 57:23 58:1,4, 8,11,15,19,23 59:2,7,17,24 60:14, 22 62:16 64:19,21,24 69:10,17 70:7 71:11 76:3,12
witnessed 18:13,14 54:6 56:25 71:11



witnesses 28:22

women 69:18

wondering 6:19

worked 28:16,20

works 28:12

write 12:12

writing 34:3,5

written 34:16,17

Y

year 37:13 42:1,3 47:4 49:8,10

years 22:18 23:15,23 38:7
51:13,16 62:21

younger 31:10

Z

Zoom 5:25

Zoom-recorded 4:6

